

REPORT OF CONSERVATION POLICY OFFICER

SUBJECT: CONSULTATION DRAFT NATIONAL PARK MANAGEMENT PLAN 2020 - 2024

Purpose of report

1. To report on the outcomes of the National Park Management Plan consultation and to seek approval for a final National Park Management Plan 2020-2024 and the statutory assessments which accompany it.

Background

2. The Environment Act 1995 requires the National Park Authority to prepare a Management Plan for the National Park.
3. Guidance on preparing National Park Management Plans in Wales was published by the Countryside Council for Wales in 2007. This was supplemented with advice issued by Natural Resources Wales in 2014 on incorporating ecosystem conservation into protected landscape management.
4. An update provided by Natural Resources Wales in May 2018 recognises protected landscape management plans as being at the heart of nature-based and place-based solutions, with major contributions to resilience and natural resource management objectives nationally.
5. The Pembrokeshire Coast National Park Management Plan 2020-2024 has been prepared in line with an engagement strategy and timetable approved by the National Park Authority on 20th June 2018 (report 25/18)¹. Officers have maintained contact with Natural Resources Wales during preparation of the draft Management Plan.

Outline of the approach

*(Full details are provided in the draft final Report of Engagement and Consultation at **Annex 1** to this report.)*

6. A number of different events were organised by the Authority's Discovery Ranger (Education) aimed at gathering the views of people less likely to engage through written consultation approaches.
7. A discussion paper² was published and promoted for comment between 20th November 2018 and 4th January 2019 as part of the early engagement

¹ National Park Authority Meeting Report: National Park Management Plan 2020-2024
https://www.pembrokeshirecoast.wales/Files/files/Committee/NPA/2018/20%20June%20AGM%20and%20Ordinary/25_18%20Nat%20Park%20Man%20Plan.pdf

² "Opportunities and Challenges: Discussion Paper for the National Park Management Plan 2020-2024"

programme for National Park Management Plan review. This preceded any policy drafting and was itself informed by informal ongoing engagement with partner organisations and the public. Fifty-one representations were received on the discussion paper.

8. Stakeholders with particular interests and expertise were involved in preparing consultation drafts of the Management Plan, the Sustainability Assessment / Strategic Environmental Assessment, and the Equality Impact Assessment.
9. The Management Plan Reference Group, a partnership group involving senior representatives of the National Park Authority and relevant authorities, was convened and met for the first time on 28th March 2019.
10. Two National Park Authority Member Workshops were held, on 20th February 2019 and 3rd April 2019. These covered unauthorised camping and visitor management, invasive species, engaging with people, cultural heritage and the marine environment.
11. Consultation drafts of the National Park Management Plan 2020-2024, Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Equality Impact Assessment were approved for consultation at the National Park Authority meeting of 5th June 2019.
12. A shadow Habitats Regulations Assessment (dated 29th July 2019) was commissioned and its recommendations taken into account in the final consultation draft National Park Management Plan³.
13. A Member / Officer meeting regarding Welsh Language impacts took place on 2nd August 2019. As a result of that meeting Welsh language impacts contained in the Sustainability Appraisal were further highlighted in *'Impacts of policy on the Welsh language. Extracts from the Sustainability Appraisal of the consultation draft Pembrokeshire Coast National Park Management Plan 2020-2024'* as part of the suite of consultation documents (attached for ease of reference as **Annex 6** to this report). The consultation questionnaire also included a specific question on Welsh language.
14. The consultation documents were available for comment between 1st August 2019 and 31st October 2019. Supporting information included a State of the Park Report. Interactive maps illustrated opportunities and challenges by Management Plan theme.⁴
15. The consultation was conducted in line with the Authority's Welsh language Standards. English and Welsh Easy Read versions of the consultation draft Management Plan (and accompanying questionnaire) were commissioned from Learning Disability Wales.

³ As per delegated authority granted at the National Park Authority meeting of 5th June 2019

⁴ <https://www.pembrokeshirecoast.wales/default.asp?PID=902>

16. Leaflets promoting the consultation were available at the Pembrokeshire County Show (13-15 August 2019), in the Authority's Llanion offices (Reception) and via Summer Rangers. An item about the consultation was provided for inclusion in *Coast to Coast 2019*. Reminders about the consultation were regularly promoted via the Authority's social media.
17. A number of groups / organisations were directly contacted with a standard bilingual email to notify them of the consultation. Recipients included organisations specifically identified as having an interest in, and potential contributions to make to, issues identified by the Equality Impact Assessment and Sustainability Appraisal. A mid-consultation reminder email was sent on 15th September 2019.
18. A second meeting of the Management Plan Reference Group took place on 24th October 2019. Key issues emerging from the Equality Impact Assessment were explored.

Changes proposed as a result of the consultation

19. Fifty-seven representations were received. These, together with officer recommendations in response, are included in Appendix 12 of Annex 1 to this report; representations are in order of their receipt.
 20. Organisations that responded were: Cadw, Dyfed Archaeological Trust, Friends of Pembrokeshire Coast National Park, Lamphey Community Council, Natural Resources Wales, Office of the Future Generations Commissioner, Pembrokeshire County Council, Pencaer Community Council, and Uzmaston, Boulston and Slebech Community Council.
 21. Input at every stage of engagement has been useful. There were fewer respondents to the final (written) consultation than in previous Management Plan reviews. This may be partly because people were able to express their views, and have these incorporated into the process, early on.
 22. Representations received and officers' recommendations on the accompanying assessments are also included in **Annex 1** (see Appendices 13, 14 and 15 for representations on the draft Sustainability Appraisal, draft Habitats Regulations Assessment, and draft Equality Impact Assessment respectively).
- Proposed changes to the Consultation Draft National Park Management Plan 2020-2024*
23. Recommended amendments are shown as tracked changes to the Consultation Draft Pembrokeshire Coast National Park Management Plan 2020-2024 (approved 5th June 2019), attached at **Annex 2** to this report. (Where proposed changes arise from a representation, the change is cross-referenced by a comment to the unique identifier used in the appendices to **Annex 1**.) Tracked changes have also been made in respect of technical updates / factual changes. These amendments have no impact on the policy proposals.
 24. The recommended amendments can be characterised as follows:

- a revised foreword
- clarifications to policy / policy impacts
- additions to policy impacts
- technical updates
- an updated 'next steps' section

Proposed changes to the accompanying assessments

25. Tracked changes highlight amendments made to the versions approved by the National Park Authority for public consultation on 5th June 2019.
26. The Equality Impact Assessment contained a number of recommendations regarding the acquisition of additional information during the consultation period. The Equality Impact Assessment has been updated to take account of how these recommendations have been pursued, to take account of recommendations in consultation responses, and to present feedback from Regional Public Bodies Equality Plan Surveys and Stakeholder events. The final draft Equality Impact Assessment is attached at **Annex 3** to this report.
27. The final draft Habitats Regulations Assessment, with tracked changes, is attached at **Annex 4**. A new addendum explains how amendments arising from public consultation have been considered in terms of Habitats Regulations Assessment.
28. The final draft Sustainability Appraisal, with tracked changes, is available via a link on the Authority's Committee Papers page (National Park Authority 11/12/2019)⁵. (A summary is also available via the link.)
29. None of the consultation responses disagreed with the conclusions of the Sustainability Appraisal, assessment of impacts of policy on the Welsh language, the Habitats Regulations Assessment or Equality Impact Assessment.
30. All the proposed changes arising from consultation have been screened in terms of Sustainability Appraisal, including Welsh language impacts, Equality impacts and Habitat Regulations impacts. None of the changes proposed are identified as having any adverse consequence.

Next steps

31. Subject to Members' approval of the recommendations of this report, those who responded to the consultation will be contacted with feedback on how their representations have been taken into account and the final documents will be published on the Authority's website. Statutory contacts and those responding to the consultation will be notified that the documents have been published.
32. A Sustainability Appraisal adoption statement, summarising how sustainability issues and consultation responses have been taken into account, must also be published. A draft adoption statement is included at **Annex 5** to this report. (The

⁵ <https://www.pembrokeshirecoast.wales/default.asp?PID=411&LangID=1>

final version will need to include a summary of any changes made as a condition of Authority approval.)

33. The National Park Management Plan 2020-2025 will be published online. It will be accompanied by interactive maps, which will be kept updated during the Plan period.
34. The National Park Authority will work with partners to implement and monitor the Management Plan. Partners will be encouraged to adopt the Plan and / or the impacts within it and to celebrate those contributions.
35. An Action Plan which highlights annual campaigns or themes, for example by focusing on heritage, conservation, or responses to climate change, will be prepared and can be reported on through Operational Review / Corporate Plan monitoring. The Action Plan can also provide a focus for funding bid development.
36. Specific discussions and work will continue in regard to implementing project-level recommendations of the Equality Impact Assessment.
37. The intention is to maintain conversations and engagement throughout the Management Plan delivery period. A cross-departmental engagement action plan group has been established within the Authority with this as a key task, reporting through the Authority's performance management framework.

Risk considerations

38. Each National Park Authority is required to prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Environment Act 1995, section 66). The Environment Act 1995 gives relevant authorities a legal duty to have regard to Park purposes and to the Sandford Principle.
39. The General Data Protection Regulation (EU) (2016/679) applies.

Financial considerations

40. Existing staff resources are being used. A small budget was allocated for the preparation of the Management Plan. Additional resources were allocated to commission the Habitats Regulations Assessment.

Welsh Language considerations

41. Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015 apply. Please also see the commentary provided earlier in this report.

Human Rights considerations

42. The Management Plan will ensure compatibility with the Human Rights Act 1998 where there is a need to reconcile differing demands. The process for Management Plan preparation and assessment procedures support this requirement.

Recommendations

That Members:

- i. **AGREE** the final Report of Engagement and Consultation on the Draft Pembrokeshire Coast National Park Management Plan 2020-2024 and the Officer recommended amendments proposed, as set out in Annex 1 to this report.
- ii. **APPROVE** the final National Park Management Plan 2020-2024 and the Officer recommended amendments proposed (Annex 2 to this report).
- iii. **APPROVE** the final Equality Impact Assessment and the Officer recommended amendments proposed (Annex 3 to this report).
- iv. **APPROVE** the [final Sustainability Appraisal \(incorporating Strategic Environmental Assessment\)](#) and [final Sustainability Appraisal Summary](#) (available via the Authority's Committee Papers page - National Park Authority 11/12/2019⁶)
- v. **APPROVE** the final Habitats Regulations Assessment and the Officer recommended amendments proposed (Annex 4 to this report).
- vi. **APPROVE** the Sustainability Appraisal post-adoption statement (Annex 5 to this report).
- vii. **GRANT** delegated authority to the Head of Park Direction to make minor amendments (i.e. technical updates or typographical errors) to the above as necessary prior to publication.

Annexes to this report:

Annex 1: Draft final Report of Engagement and Consultation

Annex 2: Consultation Draft National Park Management Plan 2020-2024 5th June 2019 with proposed final changes

Annex 3: Draft final Equality Impact Assessment

Annex 4: Draft final Habitats Regulations Assessment

Annex 5: Sustainability Appraisal (incorporating Strategic Environmental Assessment) post-adoption statement (draft)

Annex 6: Impacts of policy on the Welsh language. Extracts from the Sustainability Appraisal of the consultation draft Pembrokeshire Coast National Park Management Plan 2020-2024

Background documents

Welsh Assembly Government / Countryside Council for Wales, 2007, [Guidance on preparing Management Plans](#)

Report of the Head of Park Direction, National Park Authority 20th June 2018 (report 25/18) https://www.pembrokeshirecoast.wales/Files/files/Committee/NPA/2018/20%20June%20AGM%20and%20Ordinary/25_18%20Nat%20Park%20Man%20Plan.pdf

(For further information please contact Michel Regelous, Conservation Policy Officer, extension 4827.)

Consultees on this report: Officers from Park Direction.

⁶ <https://www.pembrokeshirecoast.wales/default.asp?PID=411&LangID=1>

*PEMBROKESHIRE COAST NATIONAL PARK
MANAGEMENT PLAN 2020-2024*

FINAL REPORT OF ENGAGEMENT AND
CONSULTATION

DRAFT

Pembrokeshire Coast National Park Authority

11th December 2019

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1. INTRODUCTION

1. Many organisations and individuals contribute to National Park purposes. A National Park Management Plan is a way of coordinating those efforts; it is a plan for achieving National Park purposes, not just a plan for the Park Authority¹.
2. The Pembrokeshire Coast National Park Authority has reviewed the current National Park Management Plan (2015-2019) for Pembrokeshire Coast National Park in line with an [engagement strategy](#) approved by the National Park Authority on 20th June 2018.
3. This final report of consultation and engagement outlines the ways stakeholders have been involved in preparation of the Pembrokeshire Coast Management Plan 2020-2024.

2. REVIEW PROGRAMME AND ENGAGEMENT STRATEGY

4. An outline timetable for Management Plan preparation was approved in the National Park Authority's Corporate and Resources Plan 2018/19. A more detailed timetable, approved by the Authority on 20th June 2018, is given below.

Milestone	Who / when
Draft preparation timetable, and methods of engagement	Leadership Team, external bodies. May 2018
Approve timetable and engagement proposals	National Park Authority. June 2018
Engage with key stakeholders: <ul style="list-style-type: none"> • Collate evidence (outcomes, issues, policy impact) • Draft / revise Plan and associated assessments (see "Requirements for impact assessments" below) • Prepare an action planning framework 	July to December 2018
Member Workshops to discuss draft reports and assessments	Spring 2019 [Workshops took place on 20 th February 2019 and 3 rd April 2019.]
Authority approval of consultation draft documents (Management Plan, Sustainability Appraisal / Strategic Environmental Assessment, Habitats	National Park Authority June 2019

¹ Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995).

Milestone	Who / when
Regulations Assessment, Equality Impact Assessment)	
Translation and formatting	June/July 2019
Public consultation (12 weeks)	Park Direction Team August 2019 - October 2019
Report of consultations to Authority. Authority approval of amended documents	National Park Authority December 2019
Translation and formatting	Park Direction/Graphics Team December 2019/ January 2020
Feedback to consultees	December 2019
Publication of approved Management Plan and assessments; formal notification / adoption statements.	January 2020

5. Informal comment on the strategy itself was invited from public, private and third sector organisations during drafting (**Annex 1**).
6. A log of engagement activity is attached at **Annex 2**.

3. EVENTS

7. Five events, aimed at hearing the views of people less likely to engage through written consultation approaches were conducted by the Discovery Ranger – Education. The list of the events is presented in the table below. A sixth event was postponed then cancelled due to lack of take-up.

Event	Date
Scolton Manor Playday	1 st August 2018
Ateb Big Day Out	17 th August 2018
Travelling Ahead Gypsy Forum	17 th October 2018
Solva Care	27 th November 2018
Youth Rangers	2 nd December 2018

8. The outputs from these events are attached at **Annex 3**.

4. OPPORTUNITIES AND CHALLENGES

9. “*Opportunities and Challenges: Discussion Paper for the National Park Management Plan 2020-2024*”² was published and promoted for comment during the period 20th November 2018 to 4th January 2019 as part of the early engagement programme for National Park Management Plan review, i.e. prior to any policy drafting.

² [Opportunities and Challenges: Discussion paper for the Management Plan 2020-2024](#)

10. The discussion paper, accompanying maps (including an online version) and a series of background papers³ were drafted by officers and were a product of informal ongoing engagement with partner organisations and the public.
11. This approach is in keeping with an iterative approach to planning, where learning during from one plan cycle informs the next. The intention is to maintain conversations and engagement throughout the Management Plan delivery period. An engagement action plan group has been established within the Authority with this as a key task, reported on through the Authority's performance management framework. Tailored discussions with a number of contacts will continue, for example, in regard to implementing equalities impact recommendations.
12. The opportunity to respond on the discussion paper was widely publicised. A range of stakeholders and partners from a list agreed at NPA 20th June 2018 were specifically notified.
13. A record of the groups contacted during the Discussion Paper consultation can be found at **Annex 2**.
14. The questionnaire provided as part of the Discussion Paper consultation can be found at **Annex 4** to this report.
15. The *Opportunities and Challenges* discussion paper and related documents (including the background papers) were available on the Authority's website. Reminders of the consultation were regularly promoted via the Authority's social media. The reminders also included promotion of an online (Survey Monkey) version of the questionnaire hosted on the Authority's website.
16. Fifty-one representations were received from nine individual / organisational responses (**Annex 5**).
17. Key opportunities and challenges identified at the conclusion of this stage were:
 - enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment
 - conserving and improving soil health and enhancing natural carbon stores
 - addressing the impacts of invasive species and plant pathogens
 - reducing greenhouse gas emissions and adapting to climate change
 - reducing pollution from nitrates and ammonia
 - protecting dark night skies
 - managing risks to heritage assets, including historic landscapes

³ (1) Background Papers: Landscape, seascape, tranquillity and dark skies; (2) Well-being, equality and livelihoods; (3) Outdoor recreation and learning; (4) Nature conservation; (5) Culture and heritage; (6) Climate and energy; (7) Natural resources; (8) Legislation and policy.

- promoting Welsh language and dialects
- providing outdoor learning opportunities, in particular for children
- providing sustainable outdoor recreational opportunities for a full cross-section of society and increasing the frequency of participation
- managing potential / actual recreational pressures such as those arising from unauthorised camping and congestion

5. CONSULTATION ON THE DRAFT MANAGEMENT PLAN, ETC

18. The key opportunities and challenges identified in the *Opportunities and Challenges* consultation (listed above) formed the basis of the consultation draft National Park Management Plan 2020-2024.
19. Stakeholders with particular interests and expertise were involved in preparing consultation drafts of the Management Plan, the Sustainability Assessment / Strategic Environmental Assessment, and the Equality Impact Assessment. See **Annex 2** to this report for a record of organisational contacts etc. made.
20. The National Park Authority meeting of 30th January 2019 considered the draft Sustainability Appraisal Scoping report. Comments can be found at **Annex 6**. The final Scoping Report was consulted on with statutory partners for a period of 8 weeks. No comments were received.
21. Two Authority Member Workshops were held, on 20th February 2019 and 3rd April 2019 (see **Annex 7** for a summary of these).
22. Consultation drafts of the National Park Management Plan 2020-2024, Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Equality Impact Assessment were approved subject to comment at the National Park Authority meeting of 5th June 2019 (**Annex 8**).
23. A Habitats Regulations Assessment of the Consultation draft Management Plan was subsequently commissioned from DTA Ecology Ltd and its recommendations were taken into account in the final consultation draft Management Plan.
24. An assessment of impacts on the Welsh language was published as part of the suite of consultation documents.
25. Supporting information included the State of the Park Report (consisting of a consolidation of the *Opportunities and Challenges* background papers, with revisions) Interactive maps illustrated opportunities and challenges by Management Plan theme.
26. All documents were produced in line with the Authority's Welsh language scheme. English and Welsh Easy Read versions of the consultation draft Management Plan and questionnaire were commissioned from Learning Disability Wales.

27. The consultation documents went live on the National Park Authority's website on 1st August 2019. Interactive maps were published online, illustrating opportunities and challenges by Management Plan theme.
28. Leaflets promoting the consultation were available at the County Show (13-15 August 2019), in the Authority's Llanion offices (Reception) and via Summer Rangers (**Annex 9**).
29. The main consultation questionnaire is summarised at **Annex 10** (an Easy Read version of the questionnaire was also available).
30. An item about the consultation was provided for inclusion in *Coast to Coast 2019*.
31. Groups / organisations listed at **Annex 11** were directly contacted (most on 2nd August 2019) with a standard bilingual email to notify them of the consultation. The list includes organisations specifically identified as having an interest in and potential contributions to make to questions raised by the Equality Impact Assessment and Sustainability Appraisal. A duplicate reminder email to these (excluding the few that had already responded) was sent on 15th September 2019.
32. The second meeting of the Management Plan Reference Group (a partnership group involving senior representatives of the National Park Authority and relevant authorities) took place on 24th October 2019. Amongst other matters, key issues emerging from the Equality Impact Assessment were explored.
33. Reminders about the consultation were regularly promoted via the Authority's social media.
34. Fifty-seven representations were identified within the 9 individual / organisational responses, together with officer recommendations for taking them into account or otherwise (**Annexes 12 - 15**).
35. The representations can be characterised as follows:
 - clarifications to policy
 - minor additions to policy impacts
 - technical updates.
36. [Note: Recommendations for taking the comments into account are subject to comment and agreement by Members of the National Park Authority (11th December 2019 meeting), following which this report of consultations will be updated as necessary and the final agreed amendments reflected in the final Pembrokeshire Coast National Park Management Plan 2020-2024.]

37. Those who responded to the consultation will be contacted with feedback on how their representations have been taken into account.
38. The final Management Plan and associated assessments will be published on the Authority's website, accompanied by interactive maps. We will continue to involve people in implementation and monitoring of the National Park Management Plan 2020-2024. Tailored discussions with a number of contacts will also continue, for example, in regard to implementing equalities impact recommendations.

DRAFT

Bold indicates that a response was received.

- Cadw
- **Dŵr Cymru Welsh Water**
- **Dyfed Archaeological Trust**
- National Trust
- Natural Resources Wales
- **Pembrokeshire Association of Voluntary Services**
- **Pembrokeshire Coastal Forum CIC**
- **Pembrokeshire County Council**
- **Pembrokeshire Nature Partnership**
- Pembrokeshire Sustainable Agriculture Network
- PLANED
- **Un Llais Cymru / One Voice Wales**
- Visit Wales
- Welsh Government

List of stakeholders / partners

People – National Park Authority	Comments	Log
Members of the Authority	Workshops and Authority meetings. Formal approval at key stages.	<ul style="list-style-type: none"> • The engagement approach and timeline were approved, with comments, by Members at The National Park Authority meeting of 20th June 2018. • Members were emailed 20/11/18 with details of the engagement opportunity / links. • Workshops with Members were held on 20th Feb 2019 and 3rd April 2019. A draft Management Plan was circulated to Members following the workshop for any informal comment by 5pm 25th April. • A draft Management Plan, Sustainability Appraisal and Equality Impact Assessment were brought to Members at their National Park Authority meeting 5th June 2019. (Comments made at that time and outcomes can be found in an annex to this report.)
National Park Authority staff	Email. Meetings. Drafting input / collaboration. Leadership Team approvals of key documents. Inform: Staff Meeting/Team Leaders meeting updates.	<ul style="list-style-type: none"> • Team Leaders were briefed on 22nd June 2018 and involvement invited. • Discovery Team Leaders were briefed on 12th Oct 2018. • Ranger Teams were briefed on 26th Oct 2018 and invited to use two questions about awareness and use of the National Park as conversation starters. • A presentation was made to the Authority’s staff meeting on 21st May 2019. • An NPA Ranger Team planning workshop focused on mapping recreational issues and proposing solutions 18th September 2019.
Volunteers	Separate meetings tend to be required for consultation	<ul style="list-style-type: none"> • Youth Ranger event was held 2nd December 2018. • Presentation was made to Activity

	<p>sessions, but could be embedded in regular sessions with some notice. Group session may require facilitation. Some may prefer questionnaires. Includes Youth Rangers. Potential for a National Park Authority Volunteer Forum.</p>	<p>Volunteers 22/3/19 at Pembrokeshire Archives. Following interest in further involvement, draft text was sent to Activity Volunteers for informal comment following the Authority Member workshop of 3/4/19.</p>
<p>UK protected landscapes Management Plan group</p>	<p>For information and any comment.</p>	<ul style="list-style-type: none"> The group of relevant officers in UK protected landscapes was emailed 27/11/18.

People - Service users	Comments	Log
<p>Access and Recreation</p>	<p>See Local Access Forum below. Also informal liaison mechanisms with recreational users (e.g. through Rangers).</p>	<ul style="list-style-type: none"> The Local Access Forum was emailed regarding the Discussion Paper on 20/11/18. The Local Access Forum was briefed at its meeting on 14/12/18 and representatives of the British Horse Society and Ramblers Association were subsequently (14/12/18) emailed with supplementary details of the consultation.
<p><i>Coast to Coast</i></p>	<p>Opportunity to inform and to invite people onto to mailing list.</p>	<ul style="list-style-type: none"> Text for an item to be included in 2019's <i>Coast to Coast</i> was agreed 19/11/18.
<p>NPA website</p>	<p>Opportunity to inform and to invite people onto to mailing list. Interactive maps.</p>	<ul style="list-style-type: none"> Discussion Paper webpage live from 20/11/18. Scoping Report live from 8/2/19.
<p>Planning</p>	<p>Issues arising from Local Development Plan preparation (National Park Authority and Pembrokeshire County Council) can be dovetailed with Management Plan</p>	<ul style="list-style-type: none"> NPA planning team input on the draft Discussion Paper. Planning colleagues in Pembrokeshire County Council were emailed 21st November 2018.

<p>Social inclusion / well-being / interpretation / social action and community projects</p>	<p>preparation.</p> <p>Opportunities where the National Park Authority hosts or attends events e.g. Family John Muir Award participants, Walkability.</p> <p>Existing structures of participation include School Governing Bodies, School Councils, Youth Assembly, 50+ Forum, Carers' Forum, Pembrokeshire Access Group, networks and forums facilitated by the Pembrokeshire Association of Voluntary Services and PLANED.</p> <p>Different approaches needed for different audiences but potential to combine groups / events. E.g. a 6th Form event could be combined with other young people as a special event.</p> <p>Potential to partner with Youth Service at e.g. skate parks.</p> <p>Feedback from above can feed into the Equality Impact Assessment of the Plan. Direct contact can be made with organisations working with people with protected characteristics (for example Pembrokeshire</p>	<ul style="list-style-type: none"> • Scolton Manor Play Day event held 1/8/18. • Ateb Big Day Out event held 17/8/18. • Travelling Ahead Gypsy Youth Forum event held 17/10/18. • Solva Care Event held 27/11/19. • Youth Ranger event held 2/12/19. • Community Connectors (Pembrokeshire Association of Voluntary Services) was emailed 4/12/18.
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	<p>People First, FRAME, Clynfyw, Value Independence, Hafal Crossroads, Mencap, VC Gallery, Croeso groups, Disability Sports Wales, Welsh Women's Aid, Hafan Cymru, Bro Cerwyn) and those facing barriers to accessing the National Park as part of equality impact assessment. Potential to arrange workshop for these organisations as part of this process looking at focused areas.</p>	
<p>Visitors to NPA sites and centres</p>	<p>Opportunity to inform and invite onto to mailing list. Themes from TripAdvisor comments.</p>	<ul style="list-style-type: none"> Discovery Team Leaders were briefed on 12th Oct 2018.

Relevant authorities	Comments	Log
<p>Relevant authorities indicated at Section 62 of the Environment Act 1995.</p> <p><u>Management Plan Reference Group:</u> Amgueddfa Cymru National Museum Wales; Dyfed-Powys Police; Hywel Dda University Health Board; Mid and West Wales Fire and Rescue Service; Natural Resources Wales; Pembrokeshire County Council; Port of Milford Haven.</p>	<p>A partnership group involving senior representatives of the National Park Authority and relevant authorities.</p>	<ul style="list-style-type: none"> The Management Plan Reference Group met on 28th March 2019. Draft Management Plan text for informal comment was sent to members of the Management Plan Reference Group after the Authority Member workshop of 3/4/19. Members of the group were emailed at the start of the consultation and received the general reminder sent on 16/9/19. A second meeting of the group took place on 24th October 2019 where key issues emerging from the Equality Impact Assessment were explored.

Relevant authorities	Comments	Log
Environment Act 1995 Section 66 statutory notifications		<ul style="list-style-type: none"> Partners were emailed on 22/11/18 (contacts in Natural Resources Wales, Welsh Government, Cadw, Pembrokeshire County Council).

People - networks and partners	Comments	Log
Age Cymru	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Bluestone Foundation		<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Cadw	Also a statutory consultee.	<ul style="list-style-type: none"> Emailed regarding Discussion Paper on 22/11/18. Notified of Scoping Report 11/2/19.
Arwain Sir Benfro	Pembrokeshire LEADER Local Action Group, facilitated by PLANED.	<ul style="list-style-type: none"> PLANED was emailed regarding Discussion Paper 26/11/18 inviting circulation to the Local Action Group.
Town Teams for main towns (Pembrokeshire County Council)	E.g. Tenby, Haverfordwest, Fishguard, Pembroke, Pembroke Dock and Milford. Via Dan Shaw.	<ul style="list-style-type: none"> Phoned and emailed Pembrokeshire County Council contact regarding Discussion Paper 26/11/18.
Conservation charities	E.g. Amphibian and Reptile Conservation Trust, British Trust for Ornithology, Buglife, Bumblebee Conservation Trust, Plantlife, Royal Society for the Protection of Birds, Wildlife Trust South and West Wales. Potential for collaboration on	<ul style="list-style-type: none"> Email regarding Discussion Paper sent to all organisations listed on 22/11/18 and in addition the Freshwater Habitats Trust.

People - networks and partners	Comments	Log
	Sustainability Appraisal.	
Country Land and Business Association		<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the Country Landowner and Business Association is represented) on 6th Sept 2018. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the Discussion Paper consultation opportunity at their meeting on 6/12/18.
Creating an Active Wales Network		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Clynfyw Care Farm	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Darwin Centre for Biology and Medicine		<ul style="list-style-type: none"> • Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Destination Pembrokeshire Partnership	Pembrokeshire Tourism, Pembrokeshire Coast National Park Authority, PLANED and Pembrokeshire County Council.	<ul style="list-style-type: none"> • PLANED was emailed 26/11/18 regarding Discussion Paper, • A Pembrokeshire County Council contact was phoned and emailed regarding Discussion Paper 26/11/18. • Pembrokeshire Tourism was emailed regarding Discussion Paper 4/12/18.
Disability Wales	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Dŵr Cymru / Welsh Water		<ul style="list-style-type: none"> • Emailed Dŵr Cymru / Welsh Water regarding Discussion Paper 22/11/18. • Email correspondence (21/6/19 and 27/9/19) on potential linkages between the Management Plan and

People - networks and partners	Comments	Log
		forthcoming Welsh Water Drainage and Wastewater Management Plan.
Dyfed Archaeological Trust		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Dyfed Powys Police		<ul style="list-style-type: none"> • Management Plan review process introduced Rural Crime Partnership Group inaugural meeting 3/7/18.
Equality and Human Rights Commission	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Farmers’ Union of Wales	See also Pembrokeshire Sustainable Agriculture Network. Potential for collaboration on Equality Impact Assessment (see also Young Farmers).	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the Farmers’ Union of Wales is represented) on 6th Sept 2018. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18.
Family Holiday Association	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Federation of Small Businesses	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Friends of the Pembrokeshire Coast National Park	Can a particular role be assigned? (20 th June 2018 NPA comment)	<ul style="list-style-type: none"> • Emailed 4/12/18. • A meeting with the Friends of the Pembrokeshire Coast National Park took place on 24th January 2019. A follow-up meeting took place on 26th February 2019 where it was agreed to seek the Friends’ views informally on draft Management Plan content. This was then sent following Member workshop of 3/4/19.
Future Generations Commissioner for Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Gypsy and Traveller Communities in Pembrokeshire	Potential for collaboration on Equality Impact	<ul style="list-style-type: none"> • Workshop with Travelling Ahead Gypsy Forum at Carew Castle 17th

People - networks and partners	Comments	Log
	Assessment. Potential for heritage-based engagement e.g. looking at Pembrokeshire Gypsy and Traveller Heritage and the National Park/ views on landscape.	Oct 2018.
Harbours		<ul style="list-style-type: none"> • Saundersfoot Harbour contacted regarding Discussion Paper via relevant authorities group mailing list Carmarthen Bay and Estuaries European Marine Sites 22/11/18.
Housing associations	Drafting stage - attending Ateb's Big Day out to gather views of tenants/service users. Pembrokeshire County Council Housing department. In terms of engaging with tenants and service users most will have tenant participation or community development teams. They are also likely to be working on health and wellbeing projects.	<ul style="list-style-type: none"> • Ateb Big Day Out 17/8/18.
Hywel Dda University Health Board		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Keep Wales Tidy	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18. • Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation –

People - networks and partners	Comments	Log
		see 'Direct Contacts – Main Consultation' above.
Health Advocates Network	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Local Access Forum	Themes also emerging from Country Paths survey, path counter figures and feedback from the Rights of Way Improvement Plan consultation (May 10 th – 3rd August). Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Local Access Forum was emailed regarding Discussion Paper 20/11/18. Attended the Local Access Forum on 14/12/18 and subsequently (14/12/18) emailed British Horse Society and Ramblers Association members with details of the consultation.
Maritime and Coastguard Agency		<ul style="list-style-type: none"> Emailed regarding Discussion Paper 4/12/18.
Menter Iaith Sir Benfro	Potential for collaboration on Equality Impact Assessment. Role in engagement on the development of policies (20 th June 2018 NPA comment).	<ul style="list-style-type: none"> Opportunity to discuss / respond to Discussion Paper was raised at Menter Iaith's Board meeting 22/11/18. Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Merched y Wawr	Added as per NPA suggestion.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Ministry of Defence	Potential opportunity to present at meetings of the Ministry of Defence access and recreation and nature	<ul style="list-style-type: none"> Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.

People - networks and partners	Comments	Log
	conservation groups.	
National Farmers' Union of England and Wales	See also Pembrokeshire Sustainable Agriculture Network. Potential for collaboration on Equality Impact Assessment (see also Young Farmers).	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the National Farmers' Union of England and Wales is represented) on 6/9/18. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18.
National networks and associations	With a view to identifying barriers, e.g. reasons for not visiting / accessing the National Park. Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
National Park Authorities (Brecon Beacons and Snowdonia)		<ul style="list-style-type: none"> • Issues were discussed at an early liaison meeting at Brecon Beacons National Park Authority 10/5/18. • Contacts at Snowdonia and Brecon Beacons were emailed regarding Discussion Paper 22/11/18 • See also table 1 re UK protected landscapes Management Plan group.
National Trust		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18
National Park voices		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper via the External Funding Manager 22/11/18
Natural Resources Wales	Potential for collaboration on Sustainability Appraisal. Also a statutory consultee.	<ul style="list-style-type: none"> • Emailed landscapes team regarding Discussion Paper 22/11/18, River Basin Management Plan contact, Natural Resources Wales members of Relevant Authority Groups; other senior managers emailed regarding Discussion Paper 22/11/18. • Notified of Scoping Report 11/2/19.

People - networks and partners	Comments	Log
		<ul style="list-style-type: none"> • A meeting with South-West Area Statement and Marine Area Statement team members took place on 30th May 2019.
Outdoor Charter Group		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Pembrokeshire Association of Community Transport Organisations		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Association of Voluntary Services	See also Third sector organisations	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18
Pembrokeshire Coastal Forum		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18
Pembrokeshire College	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Co-production Network		<ul style="list-style-type: none"> • Efforts are being made by partners (including the National Park Authority) to reconvene the network after an inactive period. A meeting of partners was held 21/1/19.
Pembrokeshire County Council	Direct links to Wellbeing Plan, Conservation, Public Transport, Social Care, Education, Children’s Services, Youth Service, town teams. Also a statutory consultee.	<ul style="list-style-type: none"> • Pembrokeshire County Council contact phoned and emailed regarding Discussion Paper 26/11/18. • Planning colleagues in Pembrokeshire County Council were emailed regarding Discussion Paper 21/11/18. • Notified of Scoping Report 11/2/19.
Pembrokeshire Get Out Get Active, Disability Sport Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Pembrokeshire Mind	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Nature	Potential for	<ul style="list-style-type: none"> • Partnership was emailed 27/11/18.

People - networks and partners	Comments	Log
Partnership	briefing/s with subsequent issues discussion.	<ul style="list-style-type: none"> • Discussion Paper was an item on Steering Group Agenda for December.
Pembrokeshire People First	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Preventions Programme Board	Potential for collaboration on Equality Impact Assessment. Particular links to Social / Green Prescribing.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Sustainable Agricultural Network	Briefing/s with subsequent issues discussion may be most effective. Pick up other specific land management interests through the network. Potential for collaboration on Equality Impact Assessment (see also Young Farmers)	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network on 6th Sept 2018. • In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18.
Pembrokeshire Tourism		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
Pembrokeshire U3A	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Voices for Equality	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Pembrokeshire Wildfire Group	Potential for briefing/s with subsequent issues discussion	<ul style="list-style-type: none"> • An update item was presented to the Pembrokeshire Sustainable Agriculture Network (on which the Pembrokeshire Wildfire Group is

People - networks and partners	Comments	Log
	may be most effective. Potential for collaboration on Equality Impact Assessment.	represented) on 6/9/18. <ul style="list-style-type: none"> In addition, Pembrokeshire Sustainable Agriculture Network members were reminded of the consultation opportunity at their meeting on 6/12/18. Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
PLANED	See also Third sector organisations and Pembrokeshire Sustainable Agriculture Network.	<ul style="list-style-type: none"> Emailed regarding Discussion Paper 22/11/18.
Port of Milford Haven	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> Contacted regarding Discussion Paper via the Pembrokeshire Marine Relevant Authorities group (29/11/18).
Public Health Wales		<ul style="list-style-type: none"> Emailed regarding Discussion Paper 4/12/18.
Public Services Board	Potential for collaboration on Sustainability Appraisal. Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> A strategic Management Plan group will include Public Services Board members – see above. (Indicative list: Pembrokeshire County Council, Hywel Dda University Health Board, Dyfed Powys Police and Crime Commissioner, Mid and West Wales Fire and Rescue Service, Defence Infrastructure Organisation, Port of Milford Haven, Cadw, Dŵr Cymru Welsh Water, Natural Resources Wales, National Museum Wales Amgueddfa Cymru.) Specifically identified contact for Equality Impact Assessment and Sustainability Appraisal consultation – see ‘Direct Contacts – Main Consultation’ above and notes on Management Plan Reference Group meetings.
Recreation Action Plan Group		<ul style="list-style-type: none"> Emailed regarding Discussion Paper 4/12/18.

People - networks and partners	Comments	Log
Religious groups	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Relevant Authorities Groups: Pembrokeshire Marine Special Area of Conservation (SAC); Cardigan Bay SAC; Carmarthen Bay and Estuaries European Marine Sites		<ul style="list-style-type: none"> Briefed Pembrokeshire Marine Relevant Authorities Group on 17/7/18 and on 23/10/18. Briefed Carmarthen Bay and Estuaries Relevant Authorities Group on 1/11/18. Group was also emailed directly on 22/11/18. Pembrokeshire Marine and Cardigan Bay were emailed via the site officers (22/11/18) who both then circulated to their groups.
Steps 2 Health		<ul style="list-style-type: none"> Emailed regarding Discussion Paper 4/12/18.
The Environmental Network Pembrokeshire	Potential for collaboration on Sustainability Appraisal.	<ul style="list-style-type: none"> Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Town / City / Community Councils	<p>Can include all Pembrokeshire Town and Community Councils. Potential for a focused consultation / questionnaire as part of Plan preparation on identified issues. See also One Voice Wales.</p> <p>Include large neighbouring town councils (20th June 2018 NPA comment)</p>	<ul style="list-style-type: none"> All town, city, community councils in Pembrokeshire were emailed (or posted where no email) regarding Discussion Paper 23/11/18.
Third sector organisations that work with people who may already access the National Park, or could	E.g. Pembrokeshire People First, FRAME, Clynyfw, Value	<ul style="list-style-type: none"> See individual rows for Pembrokeshire People First, Disability Sports Wales, Pembrokeshire Association of Voluntary Services, and PLANED.

People - networks and partners	Comments	Log
potentially benefit from greater access to the Park	<p>Independence, Hafal Crossroads, Mencap, VC Gallery, Croeso groups, Disability Sports Wales, Welsh Women's Aid, Hafan Cymru.</p> <p>Potential to work through Pembrokeshire Association of Voluntary Services and PLANED networks.</p> <p>Direct contact can be made with organisations as part of Equality Impact Assessment, potential to arrange workshop for these organisations as part of this process.</p>	<p>See events list for VC Gallery.</p> <ul style="list-style-type: none"> Specifically identified contact for Equality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Transition Bro Gwaun	<p>Potential for collaboration on Sustainability Appraisal.</p>	<ul style="list-style-type: none"> Specifically identified contact for Sustainability Appraisal quality Impact Assessment consultation – see 'Direct Contacts – Main Consultation' above.
Maintained schools within Pembrokeshire	<p>One of the Public Service Board project themes is Celebrating the Great Outdoors. Potential to use the co-ordinating body for this project to engage with schools; potential to</p>	<ul style="list-style-type: none"> To be implemented via the Public Services Board and Management Plan Reference Group.

People - networks and partners	Comments	Log
	contact governing bodies direct for better spatial targeting.	
One Voice Wales		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Visit Wales	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18. • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Wales Council for Voluntary Action		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Welsh Government	Various departments (wellbeing, renewables etc). See also Visit Wales. Also a statutory consultee.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18. • Notified of Scoping Report 11/2/19.
Welsh Language Commissioner		<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
West Wales Action for Mental Health		<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 4/12/18.
West Wales Biodiversity Information Centre	Potential to involve County recorders via the Centre.	<ul style="list-style-type: none"> • Emailed regarding Discussion Paper 22/11/18.
Women’s Institute - Pembrokeshire Federation	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Young Farmers Pembrokeshire	Potential for collaboration on Equality Impact Assessment.	<ul style="list-style-type: none"> • Specifically identified contact for Equality Impact Assessment consultation – see ‘Direct Contacts – Main Consultation’ above.
Opt-ins from events	Comments	Log
Separate list of personal contact details (22 contacts)	“Event opt-ins – personal details”	<ul style="list-style-type: none"> • All emailed (or posted where no email) regarding Discussion Paper 23/11/18.

Organisations contacted in drafting the stakeholder list	Comments	Log
<p>Cadw, Dyfed Archaeological Trust, Dŵr Cymru / Welsh Water, Natural Resources Wales, National Trust, Pembrokeshire Association of Voluntary Services, Pembrokeshire County Council, Pembrokeshire Coastal Forum, PLANED, Pembrokeshire Nature Partnership, Pembrokeshire Sustainable Agriculture Network, Un Llais Cymru / One Voice Wales, Visit Wales, Welsh Government.</p>		<ul style="list-style-type: none"> All emailed regarding Discussion Paper 22/11/18.

APPENDIX 3 – OUTPUTS OF GROUP EVENTS

Scolton Manor Play Day 1st August 2018

Summary

What's important

Coastal / beach access, countryside access.

Concerns and suggestions

Included: cleanliness; parking cost (reduce / make free) and availability; low cost / free family friendly / organised activities; toilets; dog-free beaches; promote the National Park in schools and on local radio.

Notes on conversations

What's important	What could the Authority do differently
Coast Path	
Having places to take the dog. Good camping sites.	
Being able to get outside with family and children – coast and countryside.	
Beaches and coastal path	
Access to beaches, coastal path, historical sites. Bus services	Promote Park on local radio.
Being out and cleanliness	More family activities.
The beaches	
That it's clean and accessible	
Keeping it tidy. Making it family-orientated.	Provide free parking.
Health of walking. Birds and flowers. Looking after the paths. Keeping it wild.	
Exploring, going off the beaten track.	More family activities.
Learning respect for nature, ways of conserving	Doing a great job.
Wildlife. Opportunity for children to enjoy.	Doing a great job.
Finding out about natural world. Involving the children.	Promote more in schools. More children's activities. Re-open Tenby Information Centre.
Access	Improve coast path repairs
Keeping it tidy. Taking rubbish home.	More bins.
Opportunities for children to get out and be in the fresh air.	
Dog-free beaches to play on.	Ban dogs on beaches. Enforce rules where they exist. Some children are scared.
Access for children. Keeping it open.	Improve amenities e.g. public toilets and

	water points.
Cleanliness and accessibility. Free toilets.	More dog-poo bins.
It's relaxing. Wildlife and seals.	
Open space for adventure for children.	
Access to coast and countryside.	Maybe an email update list for family activities. Information more readily and clearly available (not purely Facebook).
I like what NPA does. Especially warden service.	Charge less for locals for car parking especially if not there for a whole day.
Clean countryside and beaches. Parking pass for locals.	Parking charges – not just National Park, National Trust and Pembrokeshire County Council - yearly pass.
Clean beaches. Economy – needs to be developed.	More free / cheap events for local people (kids).

DRAFT

Summary

What's important

Coastal / beach access, peace and quiet, heritage.

Concerns and suggestions

Included: transport barriers – provide bespoke days out; information about local routes; Pathways welcome but limited for some by school hours; more activities for school children especially 8-14 year olds; access over pebbles at Newgale is difficult.

Notes on conversations

What's important	What could we do differently
Clean generally but needs to be looked after. Get out with the kids several times a week. Beaches, woods, Withybush.	More clubs etc. in schools. Make a Pathways project suited to parents constrained by school hours. Parking passes for residents.
Coast Path e.g. Martin's Haven – Solva stretch.	All good.
Natural places to visit. Pathways gives me fresh air, self-esteem, pride in doing the movie.	Provide access for wider range of people – those with no transport, young people. Improve access by bus. Provide more info on linking population e.g. Pembroke Dock to the National Park by footpaths / gateways. Best route to take on foot / bike.
Have a car, go to Neyland, Llys y Fran, beaches (Broadhaven North). Enjoy walking.	Do more to let people know where they can find NPA Facebook resources (beyond the normal page).
Know very little about the National Park. Go to beaches (often Broadhaven). Kids love it – that's the main reason. Walk days in local woodlands.	Transport is a big issue, so we have to get to beach on bus / taxi. Help somehow with more accessible places by bus. E.g. annual big day out - free bus to somewhere further afield.
Beaches - Newgale	Access over stones at Newgale is difficult.
Love beaches and countryside but options are limited for entertaining the children at their current ages.	More provision for 8-14yr olds.
We need to look after it. We get out with the kids. One child is autistic and enjoys the peace and quiet.	Communicate more about what the NPA does (limited knowledge about NPA).
Children – environmental education. Environment – development and change. Heritage – like industrial and military heritage. Caldey. Would like to visit other islands.	Parking capacity – car parks get full in season.
Beaches. Drive but would rather walk.	Litter. Picnic area and toilet provision.
Always used to go out, not like kids	Advertise more of what we do on

today. When I'm outside I feel much better (natural places).

Facebook.
More help with transport.

DRAFT

Summary

What's important

Family, recognition of health benefits of recreation, dog-walking, horse riding.

Concerns and suggestions

Included: the Authority could go to schools more often; provide more project work / outdoor learning opportunities; provide activities related to horse-riding / horse driving, cooking outdoors.

Background:

Travelling Ahead is a Welsh project working with young people and families from Gypsy, Roma and Traveller communities to give them a voice about the things that matter to them. This day was partly planned as an annual get-together with some fun activities, alongside some workshops (from the National Park Authority, Police Commissioner and National Theatre).

Our workshop was an opportunity to consult with the young people on the Gypsy community's level of understanding and engagement with the National Park and the work of the Authority. Workshop attendance was left to the choice of the participants – 11 chose to attend this one.

Engagement plan

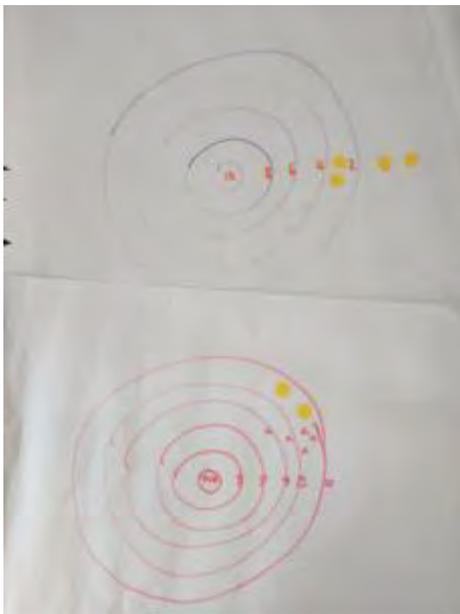
The Management Plan consultation was distilled down to two key questions:

1. How important is the National Park to you?
2. What could the Authority do differently?

A workshop exploring these questions allows us to explore many other questions – including: What is the National Park? Where is it? What can you do there? What do you like doing? What benefits do you get from this kind of activity?

The workshop was planned as a series of short activities that explored various of these issues.

1. How important is the National Park to you (using target 0-10 and stickers)



Scores showed that there is a low level of importance attached to the National Park. Discussion showed that there was a low level of awareness of the National Park / existence of a National Park Authority or what they are.

2. Where is the National Park? (asked to show on a map outline)

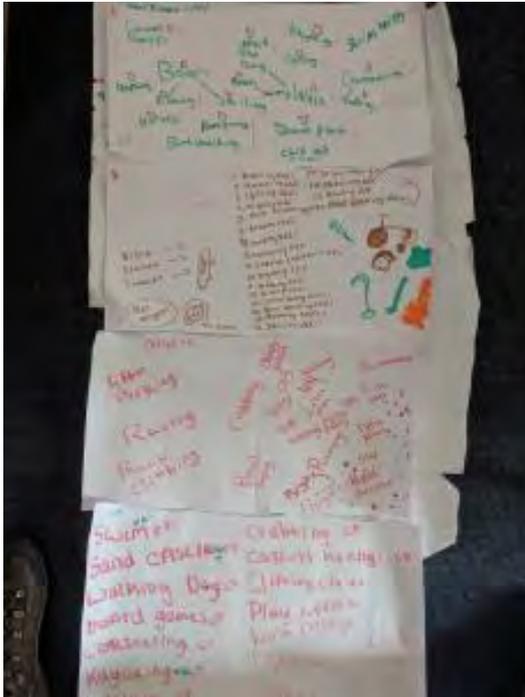


Initially no-one was able to mark the location of the National Park. Two people indicated that Carew (this workshop's location) was National Park.

Several suggested that the whole county was a National Park. When prompted to think about our name it was suggested that coast was important.

Once a map of the county / National Park boundary was shown there was a rush to draw on their own map.

3. **A. What activities can you do in the National Park?** (Looking through *Coast to Coast*)
B. What would you like to do in the National Park?



Lots of answers were suggested – based upon what they could see people doing.

When asked which of these activities they would enjoy, most adventure activities and exploring nature seemed popular, along with anything to do with horse-riding. Walking was not popular.

In discussion it emerged that there was an understanding that these activities were good for health, wellbeing and quality family time.

There was very little recognition of the special qualities (especially history / culture other than that of Gypsies), or the importance of biodiversity and conservation.

4. **How often do you go to the National Park?**

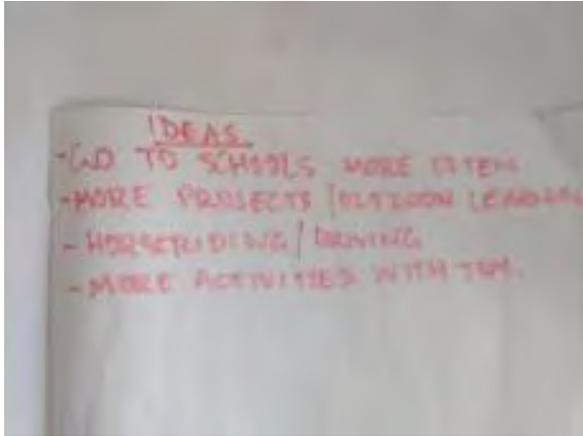


A large number of those taking part go to school in Tenby and live in Kilgetty – so they indicated that they go daily.

When discussed in more depth, there was a low frequency identified, apart from one who said she walked the dogs on the beach often with her dad, and another who rode horse on the beach monthly.

Several mentioned that they had been to Castell Henllys when in primary school.

5. What could we do differently?



It was clear that there is very little awareness of the National Park or the Authority's work. None said they had read *Coast to Coast*, looked at the Authority's website or social media. The only context anyone seemed to have come into contact with us was through school trips to Castell Henllys, or through previous outreach work done with the Travelling Ahead project.

It was suggested that the Authority could:

- go to schools more often
- have more project work / outdoor learning that they could do, or more activities like the event today.
- things to do with Horse-riding / horse driving. Also cooking outdoors.

Notes

- Staff and children liked the event - crabbing, venue and they would like to come again - possibly to a different venue (although Carew was handy as near Monkton / Kilgetty / Carmarthen where most attendees came from.
- Note Gypsy culture around cooking issues – e.g. not eating food not prepared by another Gypsy.

Summary

Concerns and suggestions

Included: cost of car parking; sharing car park proceeds; more wheelchair accessible routes.

Background

Solva Care is a not for profit social initiative, which has been set up by Solva Community Council to offer friendly, local support and help to those who need it in Solva and the surrounding area. It is a community based project focusing on social care. It was set up in 2015, in response to wishes of the local residents, to support individuals and families with a variety of services. The initiative has been extended following the success of the Pilot Project.

The aims of Solva Care are to maintain and improve health and wellbeing by:

- enabling residents to stay in their own homes and remain part of the community
- offering a way to counteract loneliness, isolation and social disadvantage
- providing extra support for those who are caring for relatives

The Event

Aim was to provide community with information about relevant organisations and services.

Approximately 25 community members took part in the session. They were all older people (50+) – some were active members of the community (including Community Council Members), and some were in receipt of support from Solva Care.

The approach

I decided to use an interactive approach and distributed 8 flipcharts to different tables. There was an outline map of Pembrokeshire and space to write. I then asked groups to respond to questions using the charts and then brief discussions were held. This was accompanied by a brief presentation illustrating the discussion points

- Where is PCNP?
- How many NPs are there in the UK?
- Why do areas become designated as NPs?
- What services does the NPA provide?
- What projects do we provide that could be accessed by the community?
- What could we do differently?

The response

In discussion all were aware of Coast to Coast, only three (of c30) had ever used website.

Where is the National Park?	Responses showed generally very good awareness of the coastal areas of the National Park, less so the Daugleddau and hardly any identification of the Preseli Hills area. Some thought all of Pembrokeshire.
How many National Parks	6-9

are in the UK?		
What are the qualities that made this a National Park?	Natural beauty / landform Geology Scientific interest Environment / nature / marine and terrestrial wildlife History Unspoilt	
What services does the Authority provide?	Planning Regulation / policies / protection Maintenance of environment / conservation Access / paths / signage / safety Car Park provision Marketing / promotion / tourism / economy Druidston? Provide activities / walks / talks / events Education Volunteering	
	No specific awareness or mention of Ranger service / individual projects.	
What could we do differently?	<ul style="list-style-type: none"> • Stop proliferation of masts / turbines • Free Parking for taxpayers / car parks! / share management of Solva Car Park / let communities run their own car park, no pay and display as employs local people / share profit • Reinstate toilets / proper disabled (changing etc) toilets • Perception of inconsistency in planning decisions • Guided dogwalks (as done on St Davids Airfield) • Develop more wheelchair accessible routes / services • Improve poor signage (Solva area?) • More buses (like Bws y Bobol, trips to supermarket) • Tree management (thin young trees to maintain Solva views) • Help to provide local workshops for entrepreneurs / local business • Decision making / ownership / information source / planning 	

Local Community Councillors reported that they were engaging with online consultation.

Summary

What's important / use of the National Park

The National Park as a resource for wellbeing, enjoyment and learning.

Concerns and suggestions

Included: transport is a barrier for young people; there should be more opportunities for practical outdoor work with agencies acting in an integrated way; young people have to move away from the area; consultation is tokenistic; Authority should promote accessible routes from population centres; promote the National Park to young people; colour-coded routes; use local people to test Authority projects and involve them in projects; biodiversity restoration; farming methods – support sustainable local food; more Authority outreach to children and families; more Authority focus on contemporary culture, also on oral history; less Authority emphasis on beach cleaning, more on lobbying and exerting influence pressure at policy levels.

From 5 Youth Rangers aged 19 -26

National Park – a landscape for life and livelihoods

Transport is a big barrier – can the Authority influence / collaborate to improve this

- Work
- Social
- Health

Experience of practical work outdoors

- We think there should be more opportunities for wider range of people
- For all

College landscape and environment course (attended by 4 of the 5)

- Doesn't equip you for work – need practical tickets e.g. chainsaw
- Problems with course being full of people who don't want to do it / mess about. Bit of a dumping ground.
- Should be tailored to actual local jobs, including placements
- Big organisations not involved (apart from providing some practical tasks). Should be involved strategically.
- One Youth Ranger found placement himself as tutors couldn't / wouldn't
- Avoid tokenistic self-evaluation etc. on learning basic skills etc. - too much reflecting, not enough doing (school and college)
- College = business, learners' needs not topmost priority.
- Quality of training and opportunities is low
- Everything needs to be more connected and related to getting a job (school, college, volunteering)
- People employed in industries often can't afford to take on apprenticeships – need support

- Many jobs taken by people from outside the county - weighting/preference given to local people?
- Pembrokeshire – better place to bring up a family (as long as you have a car etc.) – we want to stay here but probably have to move
- No more tokenistic consultation

Landscapes for Everyone

- We use for our wellbeing, enjoyment and discovery
- Transport barrier – need more promotion for those without– Places you can walk to
Really good maps would be good – accessible routes for all from population centres
- Advertised badly (to young people / locals)
- Coast to Coast – look at occasionally. Not really for us.
- “Visit Pembrokeshire” book available in Devon but not here - why?
- Awareness is low of how/why to access landscape amongst young people
- Footpaths – signage missing (farmers remove? Work better with them?)
- More info in libraries
- Colour-coded signage e.g. colour-coded routes for people to follow circular routes)
- Map of these routes in every village
- Community walks. Create routes if not there already
- Use local people to test out everything (walks, projects, marketing, sites etc.)
- No more tokenistic consultation

A Resilient Park

- Restoring biodiversity
- All think important
- New farming methods needed
- Authority should be doing more – outreach to communities e.g. pollinator friendly verges, green spaces.
- More outreach to people from very young, school, families
- Joined up-ness with Pembrokeshire County Council e.g. Scolton – not much conservation work – should be a hub for engagement/training in environmental / access etc. (central venue e.g. Scolton)
- No more tokenistic consultation

A Place for Culture – Celebrating heritage

- Very important for some, not so much for young people
- NPA focus too much on ancient culture, not contemporary culture
- Enjoy culture, but seems a bit like Culture = Castles
- More local culture in history curriculum
- Need more intergenerational/oral history – get local kids understanding local history and culture
- Need more of this stuff in teenage years – relevant to them

Global Responsibility

- Managing natural resources sustainability

- Farming practice should better encourage and support local sustainable food
- Keep prices down to allow young people to engage in e.g. local food, low plastic etc.
- Less emphasis on beach cleaning (although fun and makes a difference) – should be more use of Authority’s lobbying potential to change laws, policy and practice
- More regional/national/international political pressure rather than people moaning individually
- Local action should follow national political lead (whilst retaining local voice!)
- Consumerism and capitalism are the issues
- No more tokenistic consultation

DRAFT

<p>National Park Management Plan 2020-2024 <i>Opportunities and Challenges</i></p>	<p>Ref:</p> <p>OFFICE USE ONLY</p>
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About you (please refer to the data protection information above)

Name	
Organisation (if applicable)	
Address	
Email	

Comments

Please provide paragraph reference(s) and/or specify locations in the National Park where relevant.

1. Does the discussion paper include all the relevant Opportunities and Challenges? Should any be removed?
2. What additional Actions are needed? Should any be removed?
3. Who should be involved in delivering the Actions? (please provide the relevant action reference)

I **do not** wish my name to be published with my response
Please post or email your comments to:

Head of Park Direction
Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

Email: devplans@pembrokeshirecoast.org.uk

Closing date for comments: 5pm Friday 4th January, 2019

Thank you for completing this questionnaire.

Q1. Does the discussion paper include all the relevant Opportunities and Challenges? Should any be removed?

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP001	<p>No</p> <p>In general - Ensure that the Management Plan and LDP cross reference effectively with each other to ensure policies/plans/actions in each document are supported by the other (where appropriate) and that actions are SMART.</p>	<p>Cross-references to Local Development Plan 2 should be used as appropriate in the consultation draft Management Plan.</p> <p>The consultation draft Management Plan should express the desired results of policies and / or initiatives clearly for their consideration in the NPA's and partners' corporate planning.</p>
DP002	<p>If some recreational pressure is to be diverted to alternative locations within the park where it's felt capacity exists, how has this capacity been identified/measured and will effective monitoring be put in place to ensure carrying capacity is not exceeded in these locations?</p>	<p>This is an issue which the consultation draft Management Plan will need to engage with.</p> <p>Stakeholders (including landowners, communities and users) work together to monitor sites and seek to address carrying capacity and congestion issues. Displacement of impacts to other sites is a potential issue.</p>
DP003	<p>If the National Park intends for Oriell y Parc to become an eastern gateway to St Davids, beyond which traffic flow is to be restricted by active or passive means, this should be identified within the Management Plan.</p>	<p>The National Park Authority, along with partners including Pembrokeshire County Council (as the lead authority for traffic management), the RNLI, RSPB and St Davids City Council, is currently looking at traffic management issues within St Davids and the wider</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
		peninsula. The recent improvements to Glasfryn Road may assist in relieving congestion within the city by diverting through traffic.
DP004	User pressure is identified in Map 4 without any detailed explanation. The source is: Pembrokeshire Coast National Park Authority, by internal consultation with officers . This is not explained in detail in the background paper ⁴ and a similar view isn't extended to St Davids? The available from column needs to be completed with the data source.	The mapped areas are based on NPA staff and partner organisations' knowledge of potential / actual rural recreation / vehicle management issues and relate primarily to rural areas.
DP005	The discussion paper should cross-refer to the detail provided in the Authority's ' A Plan to provide and manage opportunities for Sustainable Recreation in the National Park ⁵ . 2.2.1 Capacity and Congestion. Many smaller coastal locations can get extremely congested at peak times, with visitor traffic including caravans and boat trailers arriving along small roads and launching from a limited number of sites. This is exacerbated where locations are used for several activities, where access is limited to single-track roads and where parking is limited. The recreational hot spot sites around St Davids Peninsula (such as Abereidid	Reference to the issues and challenges identified in <i>Enjoying the Pembrokeshire Coast National Park. A Plan to provide and manage opportunities for sustainable recreation in the National Park</i> (2011) should be included in the <i>State of the National Park</i> background paper accompanying the Management Plan.

⁴ <https://www.pembrokeshirecoast.wales/Files/files/Management%20Plan/3%20Outdoor%20recreation%20and%20learning.pdf> Accessed 17/12/2018.

⁵ <https://www.pembrokeshirecoast.wales/Files/files/PCNPA%20Recreation%20Plan%202011%20Low%20Res.pdf> Accessed 17/12/2018.

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	Porthgain, St Justinians and Solva) and around the Dale Peninsula (such as Martin's Haven, St Bride's Haven and Dale) can become congested at peak times.	
DP006	<p>Yes, it is a good document. However emphasis on adverse human impacts – Climate Change, pollution, waste, nitrogen, could be given greater prominence. Particularly in relation to importance in the plan of PCNPA direct engagement with visitors, visitor-hosting venues/properties, etc also with NP residents, on ways in which they both contribute to causing – and consequently also potentially to providing solutions. PCNPA plan could usefully incorporate even stronger sense and actions aimed at influencing visitors/residents (everyone) on mitigating environmental impacts. (see comment below). <i>[See also DP040 below.]</i></p>	<p>The consultation draft Management Plan should include an overview of the key opportunities / challenges early on in the document.</p> <p>Opportunities to influence behavioural change / awareness and, where appropriate, desired policy impacts, should be reflected for the themes of biodiversity and natural resources management in the Management Plan.</p>
DP007	<p>Many thanks for the opportunity to comment on this paper, which will feed in to the Management Plan Review. I have not put my comments into your questionnaire since it asks directly about the challenges and opportunities whereas my comments relate to wider matters. Plus I have forwarded some relevant information [Officer comment: Ammonia and Natura 200 sites, Action to address climate risks to the Historic Environment, NRW's Carbon Positive project] which may also have a bearing on the challenges and opportunities going forward.</p>	<p>Noted. Supplementary information received with thanks.</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP008	NRW welcomes this discussion paper which may lead to enhanced engagement with a wider range of stakeholders and therefore a more robust Plan. Use of social media seems to have helped stimulate communities in Snowdonia to respond to their recent similar consultation. The emphasis on wellbeing and natural resources management is especially welcome.	Noted. The potential of social media should be used where appropriate to involve people in the Management Plan process including delivery and ongoing discussion / awareness-raising.
DP009	The Area Statement process has gathered environmental data and also seeks to identify challenges and opportunities, but for a much broader area. There will be informal consultation in the coming months. The data & evidence could be very helpful to the National Park, and at least frame a wider context for the Management Plan.	The consultation draft Management Plan should where appropriate and possible refer explicitly to Area Statements priorities (note – Area Statements are not expected until after the Management Plan is published).
DP010	The background papers underpinning this discussion paper provide some useful ‘state of’ data but it would also be helpful to have more consistent trends analysis as should be contained within a State of the Park report. Reference is made in the paper on page 6 section 1.13 to ‘outcome and impact measures to identify direction and rate of travel’. Are these measures available to help review policy effectiveness? We would welcome discussion about the best way to evaluate progress and highlight challenges and opportunities.	To avoid duplication, the consultation draft Management Plan should look to national and regional interpretations of data such as those referred to in the representation to determine where focus should be. Local issues may require local data / interpretation. The consultation draft Management Plan should seek to define the policy impacts required. Authority-specific outputs and impacts will continue to be monitored through the Authority’s corporate planning framework, of which the Management Plan forms a part. Note: a telephone conference with the respondent took place on 19 th March 2019.

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP011	<p>The paper sets out the relationship between the LDP and the Management Plan but does not include reference to the Wellbeing Plan here, nor its relationship to the Management Plan. This could be helpfully clarified with a view to demonstrating how the Park contributes to wellbeing locally, regionally and nationally. It may be a useful exercise to present evidence in the Management Plan on how the Special Qualities of the Park contribute to wellbeing.</p>	<p>The Pembrokeshire Well-being Plan and the well-being goals are referred to in action example WB1 in the discussion paper and in a number of the background papers, (e.g. “Well-being, equality and livelihoods”, “Outdoor recreation and learning” and “Legislation and policy”).</p> <p>The consultation draft Management Plan should ensure that its relationship to the Pembrokeshire Well-being Plan is clear and should set out the ways in which the National Park contributes to well-being.</p>
DP012	<p>The area based approach proposed by the NP Authority is noted. The paper could also usefully reflect the other Natural Resources Policy priorities namely delivering nature based solutions and increasing renewable energy and resource efficiency. Realistically National Park management is about delivering multiple benefits derived from conserving and enhancing natural beauty and despite the competing priorities this comes across clearly in the discussion paper. We look forward to working with you to review the Management Plan and would welcome a meeting to discuss how we can best assist you.</p>	<p>The Management Plan should reference Natural Resources Policy priorities.</p> <p>The offer of working together is welcomed and a telephone conference with the respondent took place on 19th March 2019.</p>
DP013	<p>I think that all the relevant Opportunities and Challenges have been included and none should be removed.</p>	<p>Noted.</p>
DP014	<p>Page 10 Table item on Permissive path. To note that some shared use paths are for horse-riders also. However, cycleways generally are not available for equestrians. Page 11 Table item on Public Rights of Way. Same point as</p>	<p>Amend definition of permissive path in the consultation draft Management Plan to: “In addition to Public Rights of Way and shared use paths for cyclists and pedestrians, there are also many permissive paths in Pembrokeshire. These can take two forms. The first</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	above.	<p>arises where a landowner agrees to allow the public to pass along a defined route, which is not a Public Right of Way. The second is where a landowner allows higher rights to be exercised along a Public Right of Way than those legally attributed to the route, such as permitting horse riding and or cycling along a public footpath.”</p> <p>Amend definition of Public Rights of Way in the consultation draft Management Plan to: “A collective term for footpaths (a public right of way over which there is a right to pass on foot only); bridleways (a public right of way over which there is a right to pass on foot, bicycle and riding or leading a horse); Byways Open to All Traffic (a public right of way open to all types of user, including horse drawn carriages and motor vehicles); restricted byways (a public right of way which has bridleway rights of passage together with non-motorised vehicular rights of passage) and Shared Use Paths (dedicated routes shared by cyclists and pedestrians and sometimes horse riders, often alongside roads but also extending into the countryside).”</p>
DP015	Page 15 / 16. Example actions. Perhaps refer to the emerging Welsh National Marine Plan in this table?	The consultation draft Management Plan should refer to the Welsh National Marine Plan where appropriate.
DP016	Page 22. General comment about the maps from this page onwards. The maps are very informative, but quite busy. There is sometimes too much information presented to allow easy interpretation.	<p>Any paper maps associated with the consultation draft Management Plan should be simplified.</p> <p>It is intended that interactive maps are published on the National Park Authority’s website in support of the consultation draft Management Plan.</p> <p>Note: an interactive map was available online as part of</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
		the 'Opportunities and Challenges' consultation.
DP017	P8 – definition of biodiversity includes diversity within and between species, of ecosystems and the processes which underpin them.	Amend the definition of biodiversity in the consultation draft Management Plan.
DP018	P9 – the definition of resilience also includes ability to ADAPT to perturbation.	Amend the definition of resilience in the consultation draft Management Plan.
DP019	P10 – INNS impacts biodiversity and / OR human society.	Amend the definition of invasive non-native species in the consultation draft Management Plan.
DP020	P11 – Public goods. There is something here I can't put my finger on about public goods being something where the only logical 'buyer' or 'custodian' is government as it is not something for which there is a market....such as air quality.	Welsh Government has proposed a Public Goods Scheme in its Brexit and Our Land" consultation in 2018. The consequence of a Public Goods Scheme (or equivalent) should be reflected in the consultation draft Management Plan as necessary.
DP021	P17 – E1. It would be worth mentioning the role of NRW in assessing the condition of protected sites and the paucity of such data. Consequently, if it's a PCNPA target to meet favourable condition, it places increased burden on PCNPA in terms of first establishing and then monitoring condition.	Noted.
DP022	P18 – EC7 is a bit 'NRW speak'. What would this actually look like?	The phrase "place-based" appears in Welsh Government's Natural Resources Policy (2017) ⁶ where the approach is described as a "focus on collaborative working to deliver better results at a local level" (p17). Area Statements and designated landscapes are viewed as playing "a key role in identifying local opportunities and constraints linked to the national priorities" (p17). The consultation draft Management Plan should include

⁶ <https://gov.wales/docs/desh/publications/170821-natural-resources-policy-en.PDF>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
		clarification of the term “place-based” in the glossary.
DP023	P19 – H5. Local distinctiveness in the natural environment is also an element of heritage and should be referenced.	Noted.
DP024	P20 – there is strong correlation between N3 on soils and N1 on water quality in terms of both nutrients and suspended solids / siltation.	Noted. Wherever appropriate the consultation draft Management Plan should seek to present integrated policy responses to identified opportunities / challenges.
DP025	P21 – NRM5 is a highly specific action relating to a single project, whereas the others are far more broad brush. Risk if BRICs project fails. Likewise NRM6 for the SWEPT project.	Noted. The consultation draft Management Plan should where possible present policies, desired policy results and actions / initiatives to implement policy at a consistent level of scale. However it is anticipated that this will not always be possible, e.g. where policies are narrow in focus and / or are implemented through a limited number of focused actions.
DP026	Generally, there is a missed opportunity in education and awareness raising around the importance of biodiversity, ecosystem services and ecosystem resilience to get public buy in to their conservation. Actions would sit in the SMNR section (P20) or the biodiversity section (P17), or both. Working with tourism businesses and/or farmers to help them understand the value of a sustainable environment to the sustainability of their business model would be an example. The ‘Naturally Connected’ project did this and there may be potential if a Visitor Giving scheme comes to fruition.	Noted. Opportunities to influence behavioural change / awareness and, where appropriate, desired policy impacts, should be reflected for the themes of biodiversity and natural resources management in the Management Plan.
DP027	Response A: Re: 6 Managing natural resources sustainably N6: Encouraging use of public transport and active travel. Action Reference: NRM9 Collaborate in public transport, active travel and low-carbon vehicle initiatives. Re: Map1 Poppit Sands to Dinas Cross	

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>This Map needs amendment re the extent of the Active Travel Act. We are very concerned that Map 1 shows the Cardigan Active Travel Designated Locality extends only from Cardigan to St Dogmaels village boundary. Cardigan Town Council & St Dogmaels Community Council are working together to ensure the Active Travel Area extends to Poppit Beach. Active Travel Act Guidelines include Active Travel to places of leisure such as beaches and the boundary of the Pembrokeshire Coast National Park. Please amend Map 1 to show Active Travel area extends to Poppit Beach.</p>	<p>The maps supporting the consultation draft Management Plan should be amended to reflect any necessary active travel area boundary and route changes.</p>
DP028	<p>Response B: Re: 6. Managing natural resources sustainably: Opportunities and challenge N7: Promoting waste efficiency through the waste hierarchy There is no mention of reducing waste only promoting waste efficiency.</p> <p>Example Action must be:</p>	<p>The description of the waste hierarchy on page 12 (terms explained) is: “An order of preference for action to reduce and manage waste; for example prevention and minimisation of waste are preferable to energy recovery or disposal.” No amendment is proposed.</p> <p>The National Park Authority’s environmental policy is currently being updated (January 2019).</p> <p>The Authority is working with Pembrokeshire County Council, Keep Wales Tidy and Danfo on development of</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>Make Oriel y Parc more walker & environmentally friendly and provide an accessible tap for walkers to refill their water bottles.</p>	<p>water refill stations, with a number of sites under consideration for a pilot scheme and work due to be carried out next financial year. The work is being supported by funding from Visit Wales and Welsh Government.</p>
DP029	<p>Response C: Re: 4.Restoring biodiversity E 5 Preventing and mitigating the impact of invasive non-native species, pests and pathogens EC 4 Manage invasive non-native and /or harmful species in line with the Pembrokeshire Nature Partnership's Invasive Non-Native Species action plan (see map key for active catchment controls for key terrestrial invasives).</p> <p>We are disappointed that the on-going work by Cymdeithas Llandudoch/St Dogmaels Community Association since 2011 over 18 acres of Poppit Marsh, managing Himalayan Balsam & Japanese Knotweed which has been supported by PCNPA and was the foundation for PCNPA's 'Stitch in time' programme must be acknowledged by adding it to Map1. This on-going work was visited by the Minister for the Environment & recognised & acknowledged in the Welsh Assembly as an exemplar model for managing non-native invasive species This autumn [edit: the PCNPA Biodiversity Officer] offered assistance with the future ongoing work of managing invasive species at Poppit, therefore this work has to appear on Map 1.</p>	<p>Agree. Communities should be able to designate target catchments for action where they are happy to lead.</p> <p>The relevant catchment should appear as an invasive species action area in relevant maps associated with the consultation draft Management Plan.</p>
DP030	<p>Response D:</p>	

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>EC6 Manage wildfire risks Map 1 does not show Firebreak cutting in the Poppit Sands Dunes – it must be added to Map.</p>	<p>Agree. A marker will be added at Poppit Sands.</p>
DP031	<p>3. Well - being, enjoyment and discovery WB3 Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences and promote it to new audiences WB4 Implement the Annual Delivery Plans for the Rights of Way Improvement Plan 2018 2028 (e.g. providing a more continuous network and making targeted accessibility improvements) and increase community, user group and volunteer involvement in the improvement and management of public paths.</p> <p>Response E: WB4: So pleased to see 'increase volunteer involvement in the improvement & management of public paths' As Secretary of St Dogmaels Footpath Association I am pleased to see acknowledgement that volunteers can contribute (and need encouragement etc). Draft RoWIP2, in contrast, says there is no financial resource to have community involvement. PCC Footpaths Dept fail to see that there may be cost savings if you support & encourage community involvement eg in the last year St Dogmaels Footpath Association has cleared 16+ trees that had fallen & were obstructing paths and also done path clearing &</p>	<p>The Rights of Way Improvement Plan 2 (jointly published by Pembrokeshire County Council and the National Park Authority) acknowledges the scope to achieve greater community and volunteer involvement in the improvement and management of Public Rights of Way. It is clear that the authorities require more staff resources in order to realise the potential of the voluntary sector, and objective E of the Rights of Way Improvement Plan 2 provides solutions to this end including aspirations for the National Park Authority Ranger service to work across the county in the</p>

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	sweeping.	management of public rights of way with communities, user groups and client groups.
DP032	<p>Response F: WB4: Re: ‘Providing a more continuous network’ Re Map1 Poppit Sands: We are very concerned that 87/40 & 66/11 footpaths are not marked on Map 1 despite this Management Plan covering 2020-24 When PCNPA’s on-going repair is finished they will complete an amazing circular walk & shortcut between Moylegrove & St Dogmaels (Moylegrove to Pantaeson). On 31 03 2016, 13 members of St Dogmaels Footpath Association assisted with about 90 hours labour, opening up 100 metres of this diverted section of path. We have asked what else we can do to assist with completion as it is such an important link. 87/40 & 66/11 must be added to Map 1.</p>	<p>The maps provided as part of the discussion paper only depicted the network of public paths currently maintained and in use. The link provided by public footpaths 87/40 and 66/11 was not included as work is required to make it accessible. The National Park Authority is aware of the demand for this route and has identified it as a priority for improvement. Accordingly work is scheduled to commence in 2019.</p>
DP033	<p>Response G: Re 2.A landscape for life and livelihoods Opportunities & Challenges L2 Increasing people’s appreciation and understanding of the National Park and its special qualities and influencing attitudes and behaviour L6 Contributing to the economic and social resilience of communities LL2 Collaborate to ensure a sufficient supply of business premises for small and medium sized businesses. LL10 Promote the connections between landscape, culture, the historic environment and natural heritage</p>	

Ref.	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
	<p>e.g. through National Park Authority Centres</p> <p>All the examples relate to concrete physical development What is missing in the Example Actions is human interactions and training needed for the National Park to comply with its 'Duty to foster the economic and social well-being of communities living within the Park.</p> <p>An example: If PCNPA staff in Oriel Y Parc could provide information about accommodation anywhere in the PCNPA area. This would tick the economic well-being box.</p>	<p>L6 and LL10, and the associated example actions were intended to accommodate a wide range of forms of development and support. It is considered that they do so, however the consultation draft Management Plan should clarify the range of options where appropriate.</p> <p>Staff at Oriel y Parc are often the first contact for visitors arriving in the county and are delighted to try and help with all requests for information.</p> <p>Accommodation requests tend to be focused on the St Davids area. Other requests for accommodation can be serviced where accommodation providers have requested to be listed and /or where they appear on affiliated booking systems.</p> <p>It is not proposed to take forward a specific recommendation for the consultation draft Management Plan.</p> <p>Note: A copy of correspondence previously sent to Authority staff on this matter, and dealt with separately, was included in the representation.</p>
DP034	Nothing to add.	-

Q2. What additional Actions are needed? Should any be removed?

Ref	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP035	<p>The following are examples of actions that are not 'SMART'. <i>WB15 Collaborate to address user pressures (see map) including those arising from unauthorised camping, vehicles, launching, beach horse-riding, use of bicycles on footpaths, angling, powered watercraft, large events, coasteering, snow activities and drone use.</i> <i>E8 Reducing litter including littering by marine plastics and lost fishing materials.</i></p> <p>A SMART action should be included to address the identified pressure in para 2.2.1 of the Plan to provide and manage opportunities for Sustainable Recreation in the National Park.</p> <p>To facilitate the action, amendments should be made to the recently submitted LDP. This matter was raised in representation 1665 of the LDP, the response to which was that it is a matter for the Management Plan to address, which it hasn't.</p> <p>The user pressure is known, however the paper does not identify how it will be addressed.</p>	<p>The 'Example Actions' quoted were offered as examples for discussion and not as specified projects. The consultation draft Management Plan should identify the desired impacts of policies and initiatives clearly, so that they can be considered in partners' corporate planning.</p> <p>Para 2.2.1 of <i>Enjoying the Pembrokeshire Coast National Park</i> is concerned with capacity and congestion, and states that:</p> <p>"Many smaller coastal locations can get extremely congested at peak times, with visitor traffic including caravans and boat trailers arriving along small roads and launching from a limited number of sites. This is exacerbated where locations are used for several activities, where access is limited to single-track roads and where parking is limited. The recreational hot spot sites around St Davids Peninsula (such as Abereidly Porthgain, St Justinians and Solva) and around the Dale Peninsula (such as Martin's Haven, St Bride's Haven and Dale) can become congested at peak times. The Tenby and Saundersfoot areas have the largest volume of users in the county, which also creates traffic</p>

		<p>congestion between the urban centres and the coast. These well established larger centres have different congestion problems with higher numbers, better road access, parking and traffic management.”</p> <p><i>Enjoying the Pembrokeshire Coast National Park and the Destination Plan for Pembrokeshire</i> (in review) acknowledge the importance of the environment and community capacity and are supported by specific advice e.g. the National Park Authority’s <i>Recreation and Leisure Activities Supplementary Planning Guidance</i> (2012) and Pembrokeshire County Council / National Park Authority guidance for outdoor events (in development).</p> <p>User pressures including congestion are issues which the consultation draft Management Plan will need to engage with. To clarify, the <i>Opportunities and Challenges</i> discussion paper was an early stage in Management Plan preparation, rather than a draft Management Plan.</p> <p>It is worth noting that destination promotion has become heavily influenced by user content on social media in recent years.</p>
DP036	<p>SUGGESTED ADDITIONAL ACTIONS</p> <p>EC11 Collaborate with and utilise the experience of local charities and stakeholders to promote beach clean initiatives, public engagement around the issue of plastic rubbish in the marine environment.</p> <p>EC12 Build on relationships to facilitate stakeholder</p>	<p>These areas of work should be reflected in the consultation draft Management Plan; it is proposed that that this would be done by reference to the relevant marine Management Schemes and Marine Protected Area Network action plans.</p> <p>The Pembrokeshire Marine Special Area of</p>

	<p>working within the Pembrokeshire Marine SAC, engaging with fisheries and recreational boat operators to reduce disturbance and discarded fisheries rubbish.</p>	<p>Conservation (SAC) Relevant Authorities Group agrees annual actions in support of the SAC Management Scheme. These have included a number of litter related projects delivered by the SAC Officer and / or by Relevant Authority Group partners (e.g. awareness work, reducing lost tackle, line recycling, beach cleans, Fishing for Litter).</p> <p>The National Park Authority is a member of the Group. In 2018, the Marine Protected Area Management Steering Group published a costed action plan (Marine Protected Area Network Management Action Plan for Wales 2018–2019) which includes an action to “Deliver the priority actions within the Marine Litter Action Plan where they provide benefit to the network of MPAs in Wales.” The National Park Authority will contribute to this action through the Relevant Authorities group and by working with other partners as appropriate.</p> <p>Recreational disturbance may be managed with stakeholders through agreed codes of conduct (such as the Pembrokeshire Marine Code and Outdoor Charter initiatives, climbing restrictions at Castlemartin and the coasteering code of good practice) and awareness-raising (for example the coasteering and canoeing videos produced by Pembrokeshire Coastal Forum).</p>
DP037	<p>LL13 Focus on pre-identified ‘user pressure points’ (see Maps) to target effort and resource in areas with the greatest potential for increased sustainability, to maximise visitor experience and contribution to the economic and social resilience of local communities.</p>	<p>The Management Plan should consider potential recreational conflicts and how they may be resolved. Policies and actions presented in the consultation draft Management Plan should derive from National Park purposes and observe the Sandford principle (which states that in the event of an irreconcilable conflict between the purposes, conservation has greater</p>

		weight). In the pursuit of the purposes, the National Park Authority should seek to foster socio-economic well-being of National Park communities. The consultation draft Management Plan should include user management action/s reflecting this approach.
DP038	NRM10 Encourage a joined up and cohesive public transport option across the train, bus, cycle and walking networks. Provide a reliable and realistic alternative with adequate Park and Ride provision for park users.	Welsh Government transport policy aims to encourage active travel and public transport and to reduce the need to travel by private car. Pembrokeshire County Council and National Park Authority collaborate with partners to contribute to these policy goals locally. Action should be included in the consultation draft Management Plan.
DP039	NRM11 Collaborate to ensure active travel routes provide access/connect to known transport hotspots from local centres e.g. St Justinians to St Davids.	The National Park Authority is currently working with stakeholders to improve sustainable access to St Justinians by reducing the number of vehicles using the road and providing more public transport access.
DP040	“ ACTIVELY help to raise public awareness...” should be an action in <i>each</i> of topics 4 and 6. And an action to evaluate progress (qualitative/quantitative) should be included. [See also DP005 above.]	Opportunities to influence behavioural change / awareness and, where appropriate, desired policy impacts, should be reflected for the themes of biodiversity and natural resources management in the Management Plan.
DP041	Suggest section 1.7 could usefully distinguish more clearly between the generic statement about supporting EA and WFGA, and its more specific reference to NRW and Area Statements. For example, separate paragraphs to give more emphasis to fact management plan will adapt and evolve to take account of and/or align with them?	Noted.
DP042	In the Restoring Biodiversity section, there should be a	Support for the Authority’s Woodland Team’s work is

	<p>mention of the work that the woodland team undertake in restoring and managing semi-natural woodland. Invaluable work has been achieved restoring favourable management to SSSIs in the North Pembrokeshire Woodlands Special Area of Conservation; and increasing connectivity between the component sites by restoring former conifer areas to semi-natural habitats. Management work should continue here to prevent naturally regenerating conifers from reducing biodiversity in these sites. Continued management will allow nationally important populations of lichens to thrive and will ensure that viable populations of dormice and other rare species can survive. This work meets the opportunities E1 and E2.</p>	<p>noted with thanks. It is not yet clear what level of detail the Management Plan will contain but policy / programmes / impacts should reflect the importance of restoring and managing semi-natural woodland and planted / conifer sites.</p>
DP043	<p>The action EC2 should also include mention of B-lines devised by Buglife, which have already been mapped (and are mostly in the PCNPA) and can be achieved by many of the actions under 'Conserving the Park'. They meet opportunity E2.</p>	<p>Agreed. While the importance of the B-lines network and other connectivity efforts are mentioned in the <i>Nature Conservation</i> background paper to the discussion paper, the consultation draft Management Plan should also make reference.</p>
DP044	<p>Under EC8, there could be a cross-reference to the proposed SPG on lighting, as this will also contribute to conserving biodiversity by preserving and re-creating darker areas and corridors for wildlife.</p>	<p>EC8 refers to delivery of the Authority's <i>Local Development Plan 2</i>. The importance of the proposed Supplementary Planning Guidance on lighting in terms of biodiversity is acknowledged; the consultation draft Management Plan should refer to this where relevant.</p>
DP045	<p>Nothing to add.</p>	-
DP046	<p>WB8 Increase the local frequency of local participation in suitable activities (e.g. walking, cycling, rowing, paddleboarding, canoeing, kayaking, swimming) in locations where capacity exists.</p>	

<p>WB12 Collaborate in delivery of the West Wales Nature-based Health Service Project including social prescribing (e.g. targeted walking programmes and training) and support for people living with dementia and carers.</p> <p>Our comment is as follows: The discussion paper lists collaboration as one of the mandated ways of working. Collaboration needs to apply at all levels. In an age of constrained resources everything possible must be done to encourage cooperation between the statutory and voluntary sectors. Many of the aspirations stated in the draft Management Plan will only be achieved with the support and efforts of local voluntary organisations. The proposed example actions WB8 and WB12 give no hint about how better collaboration can be achieved. Let's Walk Pembrokeshire is an excellent concept as an umbrella body for walking in Pembrokeshire. However we remain to be convinced that it has significantly increased collaborative working with and between local walking organisations. Local organisations operate autonomously without any particular relevance to the purposes of the National Park. By engaging more closely with local walking organisations, the National Park has the potential to achieve the desired increase in frequency of walking listed in WB8.</p>	<p>Let's Walk Pembrokeshire is a working group of statutory and non-statutory bodies looking to increase walking as an entry-level exercise and for improving and maintaining health and well-being.</p> <p>The National Park Authority is working with Hywel Dda University Health Board, Public Health Wales and GPs' surgeries to engage social prescribing models and community involvement. Examples of this work include the Walkability programme and the Directory of local Walking Groups.</p> <p>The National Park Authority welcomes conversations with any organisations positioned to take forward the agenda. The consultation draft Management Plan should seek to increase collaboration further.</p>
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Q3. Who should be involved in delivering the Actions? (please provide the relevant action reference)

Ref	Representation on the discussion paper	Officer comment and consequence for Management Plan drafting
DP047	A full range of stakeholders, including the RSPB.	Noted.
DP048	Everyone! Authority, stakeholders, residents, visitors.....	Noted.
DP049	All the proposals above should be led by the National Park but can be undertaken in partnership with other organisations such as the County Council and Natural Resources Wales.	Noted.
DP050	Your indicative list of stakeholders for the 2020-24 Management Plan (Report 25/18) includes WWBIC and refers to involving county recorders which is welcomed. We do think we <i>[edit: West Wales Biodiversity Information Centre]</i> can add an additional role here for wider engagement in wildlife recording particularly with the ever increasing use of recording apps, online recording and public access to data (see aderyn.lercwales.org.uk)	Noted. The consultation draft Management Plan should refer to the potential for wider public engagement with surveys and survey results.
DP051	Action EC4: WWBIC has a role in managing and sharing occurrence data on invasives which may be collected from a wide range of individuals.	Noted.
DP052	Action EC6: WWBIC will share biodiversity data with MWWFRS.	Noted. This data sharing enables the Mid and West Wales Fire and Rescue Service to take habitats / species into account when responding to incidents.

APPENDIX 6 – PRECIS OF AUTHORITY MEMBER COMMENTS ON THE SUSTAINABILITY APPRAISAL SCOPING REPORT

National Park Authority meeting 30th January 2019 (see also report 05/19)⁷.

Authority Member Comment	Result
Section 3 baseline - need to identify the Authority as having a role in providing evidence for the baseline.	Incorporated into paragraph 4.2.
Page 201 travel by car phrase to include 'enhance and encourage' alternatives.	Agreed, amended sustainability appraisal objective to: "Minimise the demand for travel, especially by private car, reduce the impacts of road transport, and enhance opportunities and encourage use of alternatives."
Page 14 refer to electric cars/hybrids.	Disagree – the objective concerns reducing the need to travel particularly by private car and reducing the impacts that private car use has. Including a reference to private electric or hybrid vehicles runs contrary to the sustainability appraisal objective.
Accessibility page 198 - re self-catering range of incomes does it suggest a lack of quality which Visit Wales is after	Addressed in the NPA committee meeting. It was explained that it is regarding quality within a range of provision to suit different pockets.
Social mix (inclusivity) - do we know what that is for Pembrokeshire?	To be addressed through the Equality Impact Assessment process.
Public transport consultation issued by Welsh Government.	Noted.
Reference to 'unfavourable condition'. Looks a bit depressing - we need to highlight the NPA's land management role and successes.	Agreed. Paragraph added to the baseline.
Big discussion on second homes. No changes to document.	Noted.
8 week consultation - need flexibility for NRW possibly.	8 weeks was allowed for the consultation.
Page 16, Box 7 – agricultural ammonia emissions. Note that ammonia emissions from poultry manure can be an issue, in particular where individual units are kept below thresholds that	Amended – Ammonia emissions from poultry now mentioned in the baseline.

⁷ Link to National Park Authority papers and minutes:
<https://www.pembrokeshirecoast.wales/default.asp?PID=411&selCom=4>

would trigger EIA or environmental permit in aggregate.	
Page 18, Box 18 (typo) “Holiday homes are also...”	Amended.
Page 20, Box 24 (typo) 2nd sentence has something missing	Amended.
Page 24, Box 9 – suggested rewording of sustainability objective (“...encourage and facilitate...”)	Amended.
Page A2 – Is a note needed on Brexit?	Not at this stage as Brexit has not yet occurred and the development of the Management Plan and the Sustainability Appraisal can only take into account policy that is currently in place.

DRAFT

Management Plan Workshop 20th February 2019

Members received a draft copy of the Report of Consultations on *Opportunities and Challenges: Discussion Paper for the Management Plan 2020-2024* in advance of the workshop. During the workshop, Members discussed the following identified opportunities and challenges: unauthorised camping and visitor management; invasive species; engaging with people.

Management Plan Workshop 3rd April 2019

Members discussed issues and management options relating to cultural heritage and to the marine environment. Next steps in Management Plan preparation were outlined. Members received an early draft Management Plan with a period for informal comment of 3 weeks (24th April 2019).

Management Plan Workshop 15th May 2019

This workshop was cancelled as it was not required.

DRAFT

APPENDIX 8 – PRECIS OF AUTHORITY MEMBER COMMENTS ON THE DRAFT MANAGEMENT PLAN

National Park Authority meeting 5th June 2019 (see also report 23/19)⁸.

Authority Member Comment	Result
Comments regarding Welsh language impact assessment of the draft.	<p>A meeting regarding Welsh Language Impact Assessment took place on 2nd August 2019.</p> <p>Welsh language impacts contained in the Sustainability Appraisal were duplicated into a new document <i>“Impacts of policy on the Welsh language. Extracts from the Sustainability Appraisal of the consultation draft Pembrokeshire Coast National Park Management Plan 2020-2024”</i> as part of the suite of consultation documents.</p>
Suggestion that policy H2 be separated into language and other cultural elements.	<p>Separation of H2 into H2 and a new policy H3 was trialled, however it was considered that they and the associated impacts were stronger together. For example, duplication of H2 b in H3 would have been necessary in order not to exclude wider story telling not related to Welsh Language (e.g. the 80th anniversary project collecting stories from people who have lived on Castlemartin Range, or people reflecting on own heritage and relationship with landscape). No change to draft Management Plan.</p>
Comment regarding impacts of toilet closures.	<p>Noted. This subject has arisen through the Equality Impact Assessment process. No change to draft Management Plan.</p>
Pleased to see place-names included.	<p>Noted. No change to draft Management Plan.</p>
Comment on the importance of continued budgets for water quality monitoring as water quality fundamental to economy.	<p>Noted. No change to draft Management Plan.</p>
Comment that reference to the marine environment should appear in the list of opportunities and challenges.	<p>The first point at para 1.13 has been amended to: “enabling ecosystem recovery at scale and improving the state</p>

⁸ Link to National Park Authority papers and minutes:
<https://www.pembrokeshirecoast.wales/default.asp?PID=411&selCom=4>

	of wildlife on land and in the marine environment”
Amend glossary definition of affordable housing (alternative for “unsuitable”)	The definition of affordable housing has been amended to: “Housing for sale or rent at prices below the market rate, provided for local people in inappropriate housing who cannot afford to resolve their housing needs in the open market.”
Noted the importance of tourism revenue to the region and a potentially greater role for the NPA in future.	Noted. The importance of the visitor economy is featured in the consultation draft Management Plan. No change to draft Management Plan.
The Foreword should better reflect the changed legislative and policy context. This includes building on previous work, the new legislative framework (Well-being of Future Generations (Wales) Act 2015, Environment (Wales) Act 2016, Historic Environment (Wales) Act 2016, Planning (Wales) Act 2015, Welsh Government’s <i>Natural Resources Policy</i> (2017), <i>Valued and Resilient: The Welsh Government’s Priorities for the Areas of Outstanding Natural Beauty and National Parks</i> (2018). These also include different approaches, such as the new ways of working, Area Statements etc.	The foreword has been redrafted with the suggested additions referenced. Additional references to new legislation have been added at para 1.6.
Policy L3b (page 14): what are defence sites? If these mean MoD owned sites this needs to be specified or have this explanation/definition in the glossary of terms.	L3b amended to read “Manage proposals for intensification of use or extension of Ministry of Defence sites in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policy.”
Policy W1e (page 15): getting an Excellent for Wiseman's Bridge is an achievement, but in terms of the Management Plan shouldn't we be aiming to ensure that <u>all</u> excellent rated beaches retain this standard? (not just highlighting Wiseman's Bridge).	W1e amended to read “Improve water quality at designated bathing waters achieving less than “Excellent” status.”
Policy W1k (page 16): do we need to be more specific? - we need to manage slipways, berths, mooring and shore facilities anyway, are we aiming to do them to a particular standard (I would hope so!) and all of them under our control? Or ensure others do? Provide appropriate facilities?	The original policy wording conflated a number of assets which individually may require different management approaches. In order to convey the principle of continued facilitated access to water and to provide a context for a full range of

	<p>projects over the Plan period, W1k has been amended to read: “Collaborate to enable public access to water where appropriate for quiet enjoyment.”</p>
<p>Policy N1a (page 22): how are we going to contribute specifically? [it is this one in retrospect perhaps I should have raised for general discussion, although I assume it is an area that has been discussed at length previously] We are expected to be an exemplar - should we be setting/stating some targets for the Authority here? Not just 'pursuit of WG ambition'?</p>	<p>N1a refers to Welsh Government’s low-carbon Wales proposals and is somewhat of a signpost to more specific areas of policy / impact.</p> <p>N1a has been amended to read: “Collaborate in delivery of actions in <i>Prosperity for All: a Low Carbon Wales</i> including a carbon neutral public sector by 2030, implementing renewable energy and energy efficiency measures (see N1b), reducing transport emissions (see N1d) and safeguarding and increasing carbon storage (see N3b) including agricultural soils.”</p> <p>Authority-specific actions and performance metrics will be included in the Authority’s Corporate and Resources plans over the Management Plan period.</p>
<p>Policy N2b (page 22): repeats Policy W1e (page 15).</p>	<p>The duplicate wording has been deleted from N2.</p>
<p>Policy N3 (page 23): should we also include as an extra point here the catch-all phrase used in other Policy areas about following/using the PCNPA LDP2?</p>	<p>A new impact has been added: “Manage development in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policies and guidance in relation to soil, water, air and earth heritage.”</p>
<p>Policy N4b (page 23): do we need to add something as well as monitoring? What is the purpose of monitoring these trends? Will we take action if the monitoring shows increasing trends?</p>	<p>N4b amended to: “Monitor and manage as necessary pollutants such as oxides of nitrogen, carbon monoxide and particulates.”</p>

Cynllun ar gyfer y Parc a'i bobl



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Mae **Awdurdod Parc Cenedlaethol Arfordir Penfro**

wrthi'n paratoi fersiwn newydd o Gynllun Rheoli'r Parc Cenedlaethol am y cyfnod 2020-2024.

Bydd y Cynllun yn nodi'r hyn y gall bob yr un ohonom ei wneud i ofalu am y Parc Cenedlaethol, mwynhau a dysgu am y Parc, gan gynnal bywoliaeth y bobl yn y broses.

Ymgynghorir â'r cyhoedd ynglŷn â'r Cynllun drafft yn ystod y cyfnod o'r 1 Awst - 31 Hydref 2019.



Cofiwch ymweld â gwefan yr Awdurdod ar www.arfordirpenfro.cymru/dweudeichdweud neu ffoniwch 01646 624800 i ddarganfod mwy.

A Plan for the Park and its people



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

A new National Park Management Plan for 2020-2024 is being prepared by the **Pembrokeshire Coast National Park Authority**.

The Plan will set out what we can all do to look after, enjoy and learn about the National Park, supporting people's livelihoods in the process.

Public consultation on the draft Plan runs from 1 August - 31 October 2019.

Please visit the Authority's website www.pembrokeshirecoast.wales/haveyoursay or phone 01646 624800 to find out more.



(An Easy Read version of the questionnaire was also available in Welsh and in English.)

<h2 style="margin: 0;">National Park Management Plan 2020-2024 Consultation</h2>	Ref: OFFICE USE ONLY
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About you (please refer to the data protection information above)

Name	
Organisation (if applicable)	
Address	
Email	

Comments

Please provide paragraph reference(s) and/or specify locations in the National Park where relevant.

<p>1. Are the themes for partnership action in the draft Management Plan appropriate for achieving National Park purposes? Yes / No / Don't know If not please explain why.</p>
<p>2. Do the policies in the draft Management Plan address all the relevant opportunities and challenges? Yes / No / Don't know If not why not?</p>
<p>3(a) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)? Yes / No / Don't know If not, why not?</p>
<p>3(b) Could you or your organisation help deliver and /or provide monitoring data for the impacts? Please specify.</p>
<p>4(a) Do you agree with the Sustainability Appraisal of the draft Management Plan? Yes / No / Don't know If not please explain why.</p>
<p>4(b) Do agree with the Sustainability Appraisal's assessment of the impacts of the draft Management Plan on the Welsh language? Yes / No / Don't know If not please explain why.</p>
<p>5(a) Do you agree with the Equality Impact Assessment of the draft Management</p>

Plan? Yes / No / Don't know
If not please explain why.

5(b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment? *(Please see the "Actions and Implementation" tables at the end of the Equality Impact Assessment for a summary of these.)*

6. Do you agree with the Habitat Regulations Assessment of the draft Management Plan? Yes / No / Don't know
If not please explain why.

7. Are there any comments you would like to make on the consultation documents?

I **do not** wish my name to be published with my response

Please post or email your comments to:

Head of Park Direction
Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

Email: devplans@pembrokeshirecoast.org.uk

Closing date for comments: 5pm Thursday 31st October 2019

Thank you for completing this questionnaire.

APPENDIX 11 – CONSULTATION CONTACTS

- Age Cymru
- Amgueddfa Cymru – National Museum Wales
- The Amphibian and Reptile Conservation Trust
- Ateb
- Bluestone Foundation
- British Trust for Ornithology
- Buglife
- Bumblebee Conservation Trust
- Cadw
- City, Town and Community Councils in Pembrokeshire
- Clynfyw Care Farm
- Campaign for National Parks
- Creating an Active Wales Network
- The Darwin Centre
- Dyfed Archaeological Trust
- Dŵr Cymru / Welsh Water
- Destination Pembrokeshire Partnership
- Disability Wales
- Dyfed-Powys Police
- Ethnic Minorities and Youth Support Team Wales
- Equality and Human Rights Commission
- European Marine Sites
- Family Holiday Association
- Farmers Union of Wales
- Federation of Small Businesses Wales
- Friends of the Pembrokeshire Coast National Park
- Freshwater Habitats Trust
- Gypsy Council
- Keep Wales Tidy
- Mid and West Wales Fire and Rescue Service
- Maritime and Coastguard Agency
- Menter Iaith Sir Benfro
- Merched y Wawr
- Mind Pembrokeshire
- Ministry of Defence
- National Association for Areas of Outstanding Natural Beauty
- National park authorities
- Newport Area Environment Group
- National Farmers Union Cymru
- National Health Service Wales
- National Park volunteers
- Natural Resources Wales
- National Trust
- Office of the Future Generations Commissioner
- One Voice Wales Un Llais Cymru
- Pembrokeshire Association of Community Transport Organisations
- Pembrokeshire Association of Voluntary Services
- Pembrokeshire Coast Charitable Trust

- Pembrokeshire Coast National Park Authority Members
- Pembrokeshire Coast National Park Authority Staff
- Pembrokeshire Coast National Park volunteers
- Pembrokeshire Coastal Forum
- Pembrokeshire County Council
- Pembrokeshire Tourism
- Pembrokeshire College
- Pembrokeshire Co-Production network
- Pembrokeshire Nature Partnership
- Pembrokeshire People First
- Pembrokeshire Voices for Equality
- Pembrokeshire Young Farmers Club
- PLANED
- Plantlife Cymru
- Port of Milford Haven
- Pembrokeshire Sustainable Agriculture Network
- Public Health Wales
- Recreation action plan group (Pembrokeshire)
- Respondents to the *Opportunities and Challenges* consultation paper
- Royal Society for the Protection of Birds
- Saundersfoot Harbour
- School governing bodies
- Steps2health Walking Club
- The Environmental Network for Pembrokeshire
- Transition Bro Gwaun
- Visit Wales
- Wales Council for Voluntary Action
- Welsh Language Commissioner Comisiynydd y Gymraeg
- West Wales Action for Mental Health
- West Wales Care Partnership
- Welsh Government
- Wildlife Trusts Wales
- Women's Institute Pembrokeshire
- West Wales Biodiversity Information Centre

APPENDIX 12 – REPRESENTATIONS ON THE CONSULTATION DRAFT MANAGEMENT PLAN

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
MP001	Uzmaston, Boulston and Slebech Community Council	<p>1. Do you think we have said enough about: How we can make the park better?</p> <p>No A big part of the local public's interaction with the NP is through planning applications. It might be worth being clearer about planning policy as many people find the officers' interpretation subjective rather than following an easily accessed set of guidelines. Many local people are also anxious about second home purchases disrupting the housing economy and communities. The NP has a policy - again it might be worth reinforcing your stance.</p>	<p>The role of the Management Plan is to provide a strategic context for the Local Development Plan and the current approach is considered to be sufficient and appropriate. The detail of the Local Development Plan is assessed rigorously through engagement and finally through Examination. These issues in particular have been raised and discussed extensively through Examination. Planning application assessments rely primarily on the detail of the Local Development Plan which has to be consistent with the</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>Management Plan. Consistency with the Management Plan is one of the tests of soundness. A Planning Officer's professional advice will be in accordance with policy and supporting guidance but will also need to consider other material planning considerations.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP002	Uzmaston, Boulston and Slebech Community Council	<p>Please be clearer about how the NP can influence water quality – is it directly or through the Environment Agency?</p> <p>The rivers are dying around Wales mainly due to nitrate pollution from recent changes in farming practice to create high intensity milk production. Some farmers are using big contractor led operations to spread vast quantities of slurry which ultimately pollutes the water courses resulting in a toxic</p>	<p>The EU Nitrates Directive (91/676/EC) is currently implemented via The Water Resources (Control of Pollution) (Silage, Slurry and Agriculture Fuel Oil) (Wales) Regulations 2010 and The Nitrate Pollution Prevention (Wales) Regulations 2013 (as amended).</p> <p>Natural Resources Wales enforces the regulations, including the Action Programme.</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>environment for river fauna.</p> <p>Please be clear about the NP's policy on tackling this problem.</p>	<p>New regulations for the whole of Wales are scheduled for January 2020 and include provisions for:</p> <ul style="list-style-type: none"> • Nutrient management planning • Sustainable fertiliser applications linked to the requirement of the crop • Protection of water from pollution related to when, where and how fertilisers are spread and • Manure storage standards. <p>Amend relevant policies / impacts to read: <i>N2(a) Support monitoring and status improvement of those water bodies in the National Park classed as poor or moderate through Natural Resources Wales' River Basin Management Plan programme of measures*, the regulations scheduled for 1st January 2020, and through complementary initiatives e.g. nutrient trading.</i></p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p><i>[move to footnote] *The programme of measures includes volume reduction and best practice management of slurry, silage, fuel oil, and agricultural chemicals; clean and dirty water separation; nutrient management planning; buffer strips and riparian fencing; cover crops and soil management in targeted catchments.</i></p> <p><i>N4(a) Support Natural Resources Wales and the agricultural sector to reduce or intercept reactive nitrogen emissions with an initial focus on potentially-affected nature conservation sites.</i></p>	None (clarification).
MP003	Uzmaston, Boulston and Slebech Community Council	Please provide information on how the NP is going to promote a better litter avoidance culture.	Waste disposal is a function of the local authority rather than the National Park Authority. In terms of where the authority has a planning role planning policy in the Local Development Plan provides for local waste management facilities and composting in accordance with regional	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>and local strategies.</p> <p>The Authority also, for example:</p> <ul style="list-style-type: none"> • Uses interpretation (e.g. by commissioning artwork) to increase awareness of impact of marine litter on wildlife and coastline. • Contributes to the relevant authority groups for Pembrokeshire Marine Special Area of Conservation, Cardigan Bay Special Area of Conservation and Carmarthen Bay and Estuaries European Marine Sites, which have included litter awareness and reduction initiatives. • Organises litter picks with schools and other groups. • Has liaised with Dyfed-Powys Police to appeal to members of the public to stop camping in dunes, following a spate of incidents involving camp fires and littering. 	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<ul style="list-style-type: none"> • Is installing a number of water refill stations to reduce single use plastic bottles. • Responds to consultations (e.g. in 2019 the Authority responded on consultations on deposit return scheme, packaging producer responsibility and plastic packaging tax proposals). <p>Amend L1 by adding a new point L1 (g.): <i>Manage littering and raise awareness of its impacts.</i></p>	None.
MP004	Uzmaston, Boulston and Slebech Community Council	Please identify areas in the NP which are being “re-wilded” to encourage wildlife diversity.	<p>Re-wilding implies large scale ecological restoration with apex predators / keystone species. There are no areas which fulfill this description in the National Park.</p> <p>The State of the Park report includes an ecological characterization of areas of the National Park and the interactive maps feature amalgamated Natural Resources</p>	None.

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			<p>Wales focal connectivity networks (i.e. for bog, fen, grass, heath and woodland). Areas which serve more than a single network appear darker. These will complement the Nature Recovery Action Plan for Pembrokeshire in providing a context for local action for biodiversity.</p> <p>No change to Management Plan is recommended.</p>	
MP005	Uzmaston, Boulston and Slebech Community Council	<p>3) Do you think we can achieve our goals in the next four years?</p> <p>Yes</p>	Noted.	None.
MP006	Uzmaston, Boulston and Slebech Community Council	<p>4) Can you or your organisation give us information to help us find out if we are achieving our goals?</p> <p>Yes Observing wildlife activity through participation in activities such as</p>	Noted with thanks. To follow up during implementation.	None.

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		<p>butterfly and bumble bee counts as well as monitoring interesting and rare species</p> <p>Checking water quality through initiatives such as that promoted by SWEPT</p> <p>Monitoring and ultimately helping to clean the watercourses of man-made litter</p>		
MP007	Office of the Future Generations Commissioner	<p>Thank you for sending us your consultation on the draft Pembrokeshire Coast National Park Management Plan 2020-2024.</p> <p>I receive a large number of requests and consultations and, given the capacity of my office, I am only able to provide full responses to consultations directly related to my areas of focus (transport, housing, skills for the future, planning, better ways of keeping people well, adverse childhood experiences,</p>	<p>The Frameworks documents are noted with thanks (Framework for Service Design, Framework for Projects, Framework for Scrutiny).</p>	

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		<p>decarbonisation, procurement and budget).</p> <p>Having said that, to support your work, I attach some of my Future Generations Frameworks. I expect public bodies, such as yourself, to fully implement the Act and its elements and carry out their duties. To this effect, my frameworks set prompts to guide public bodies in formulating policies and taking decisions, but also to scrutinise such decisions or policies.</p> <p>As you will see the prompts set out in the frameworks will be relevant to your consultation exercise (its substance and the way you use the five ways of working) and should, therefore, guide your work.</p> <p>It is important that your own well-being</p>	<p>The Themes for Partnership Action outlined in the draft Management Plan reflect National Park purposes and align with the Well-being of Future Generations (Wales) Act 2015 (amongst other legislation and policy – see para 1.6 of the draft Management Plan).</p> <p>Para 1.17 of Annex A of the draft Management Plan sets out the ways in which the management planning process, and the management plan itself as a plan that gives rise to projects, will fulfill the five ways of working.</p> <p>Plan review has taken place in line with an</p>	

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		<p>objectives, the well-being plan and objectives of the local Public Services Board, the national well-being goals and the sustainable development principle (including the 5 ways of working) are considered throughout the process. I hope that you will find these frameworks useful.</p> <p>I would also suggest you have a look at the Journeys I have published on my website as part of my partnership programme Art of the Possible. These shine a light on good practice and contain steps towards sustainability that I would like public bodies to take. So far, I have published three Journeys (A Journey to Resilient Wales; A Journey to Globally Responsible; and A Journey to A Wales of Vibrant Culture and Thriving Welsh Language), which might contain steps that relate to this</p>	<p>engagement strategy approved by the National Park Authority on 20th June 2018. Comment on the strategy itself was invited from public, private and third sector organisations during drafting.</p> <p>Noted. Other Journeys have now been published (A Prosperous Wales, A More Equal Wales, A Healthier Wales, A Wales of Cohesive Communities, A Journey to</p>	

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		<p>consultation.</p> <p>As I would like to create documents that are of great use for people and public bodies, I will continue developing my frameworks and Journeys in the future. Therefore, I would be grateful if you could provide us with any feedback on your experience of using them as part of your work.</p>	<p>Involvement. These define the issues and set out the steps to sustainability within each theme. Examples of simple and more ambitious changes are included and many of these are relevant to and included within the Management Plan.</p> <p>It is envisaged that the Journeys will provide a valuable resource during implementation.</p>	None.
MP008	Dyfed Archaeological Trust	<p>Are the themes for partnership action in the draft Management Plan appropriate for achieving National Park purposes?</p> <p>Yes</p>	Noted.	None.
MP009	Dyfed Archaeological Trust	<p>2. Do the policies in the draft Management Plan address all the relevant opportunities and challenges?</p> <p>Yes</p>	Noted.	None.

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MP010	Dyfed Archaeological Trust	<p>3(a) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)?</p> <p>Yes</p>	Noted.	None.
MP011	Dyfed Archaeological Trust	<p>3(b) Could you or your organisation help deliver and /or provide monitoring data for the impacts? Please specify.</p> <p>We could help deliver and provide data and advice for several of the impacts listed under Policy H1.</p> <p>Opportunities may also exist within other policies such as policy W1 (h), W2 (a & b), E1 (k) and H2 (a & d).</p>	Noted with thanks. Heritage could be an area of focus for management plan implementation via the action plan.	None.
MP012	Dyfed Archaeological Trust	<p>4(a) Do you agree with the Sustainability Appraisal of the draft Management Plan?</p>		

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		<p>No</p> <p>If not please explain why. Generally the answer is yes. In the sustainability objective 1.2. i refers to viable agriculture and forestry, but the Policy E1 concentrates on conserving and restoring semi natural woodland with no mention of coniferous forestry plantations. Coniferous forestry is a significant landscape feature of parts of the Preseli Mountains and we would like to see a policy on replacing this with native woodland or restoring it to open moorland.</p>	<p>Agree. Amend E1 (b) to: <i>E1 (b) Conserve and restore semi-natural woodland, wood pasture, trees in the landscape and field boundaries, taking into account species' connectivity needs, landscape and the impacts of plant pathogens e.g. Chalara ash dieback, and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape.</i></p> <p>Also add revised this wording to L1 (c.) and N3 (c.)</p>	<p>None (clarification).</p>
MP013	Dyfed Archaeological Trust	<p>7. Are there any comments you would like to make on the consultation documents? Under the heading 'What will Success</p>	<p>Consultation question 3 (a) sought to elicit</p>	

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		<p>look like?' We are not sure of the meaning of 'it sets out a range of desired policy impacts which will be used to evaluate the direction and rate of travel over the Plan period.' We accept that some outcomes are difficult if not impossible to measure, but some are not. There needs to be a statement in the document where there are clear measurable outcomes/outputs. For instance Policy L1c reducing visibility of existing infrastructure in the examples provided is clearly measurable. There are others where measurement would be appropriate.</p>	<p>views on how impacts could be better defined. This is a task that will need to continue during Plan implementation and we would welcome more discussion with Dyfed Archaeological Trust on this (links to representation MP011 above).</p> <p>The Plan is evidence-based (key evidence sources used in the State of the Park Report are summarised at Annex C) and the quoted para 1.15 of the draft Management Plan is not intended to suggest that there will be no outcome monitoring, rather that there should be no upper bound for improvement for the state of the natural and historic resources of the National Park as might be implied by an outcome target.</p> <p>The impacts (outputs) listed are the proposed means to achieve the policies over the Plan period. These are for</p>	

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			individual organisations and for partnerships and would be measured through corporate planning processes and through management planning reporting. Amend the end of para 1.15 of the draft Management Plan (main text) by adding "Progress will be assessed through annual reports and State of the Park reporting."	None (clarification).
MP014	Pembrokeshire County Council	1. Are the themes for partnership action in the draft Management Plan appropriate for achieving National Park purposes? We agree that the themes identified are appropriate.	Noted.	None.
MP015	Pembrokeshire County Council	2. Do the policies in the draft Management Plan address all relevant opportunities and challenges? We agree that the policies are	Support welcomed. Pembrokeshire County	None.

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		<p>appropriate and note PCNPA's commitment to work with Pembrokeshire County Council (and other stakeholders) on a range of initiatives to support these. We have suggested some minor refinements at the end of this submission. You may also be interest to note that in our draft response to Welsh Government's consultation on its National Development Framework we have questioned the proximity and therefore intervisibility between the Priority Areas for Renewable Energy in Pembrokeshire and the National Park boundary.</p>	<p>Council's response to the Welsh Government's consultation on the National Development Framework is noted with thanks.</p>	
MP016	Pembrokeshire County Council	<p>3. (a) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)?</p> <p>We agree that the actions are</p>	Noted.	None.

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		appropriate for this time period. Some of the actions may well go beyond the end of the Plan period as they are necessarily longer term actions.		
MP017	Pembrokeshire County Council	<p>3. (b) Are the impacts listed under each policy in the draft Management Plan appropriate for the Plan period (2020-2024)?</p> <p>We will be involved in many of the impacts listed in the Plan. Examples include the coast path and rights of way, promoting Pembrokeshire as a tourism destination and managing recreation, ecology and protecting habitats, the historic built environment and lighting / dark skies, promoting Welsh and monitoring / reducing pollution.</p> <p>Over the plan period, some of the ways in which we deliver our contribution to</p>		

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		the Management Plan may develop (for instance, tourism partnerships) and we welcome the opportunity in the draft Management Plan for continued dialogue.	Noted with thanks.	None.
MP018	Pembrokeshire County Council	<p>Are there any comments you would like to make on the consultation documents?</p> <p>Yes – see comments on matters of detail listed below.</p> <p>Page 13, Policy L2 – Protect and enhance dark night skies – item a) add ... in partnership with Pembrokeshire County Council.</p> <p>The shape of the NP is such that a whole County approach will be needed if this is to be effective.</p>	<p>Agree. Amend L2 a) to: <i>L2 a) Produce and promote supplementary planning guidance for Pembrokeshire on lighting for developments requiring lighting schemes (Pembrokeshire County Council and Pembrokeshire Coast National Park Authority).</i></p>	None.
MP019	Pembrokeshire	Page 15, Policy W1 – Provide and		

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	Pembrokeshire County Council	promote sustainable outdoor recreation opportunities for all – item a) add ... in partnership with Pembrokeshire County Council. Part of the Coast Path is located outside the National Park and hence a collaborative approach is needed to ensure the integrity of the linear route.	Agree. Amend W1 (a) to: <i>W1 (a) Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences, and promote it to new audiences (Pembrokeshire Coast National Park Authority and Pembrokeshire County Council).</i>	None (clarification).
MP020	Pembrokeshire County Council	Page 18, Policy E1 – Protect and improve biodiversity quality, extent and connectivity at scale – item d) add references to the emerging NDF and Welsh National Marine Plans.	The Annexes to the draft Management Plan provide more background to the National Park and the Management Plan. They contain information including relevant legislation, policy and guidance and how it is being taken into account; more on the special qualities; lessons learned from the previous Plan and how the key opportunities and challenges have been identified. Annex B lists some of the context (e.g. national priorities, other plans or programmes) taken into account in drafting the Management Plan. These and many other documents are relevant. The	

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			<p>importance of the emerging National Development Framework and Welsh National Marine Plan are acknowledged, however it is considered that to add these references would potentially detract from policy clarity. The named documents will be taken account of in decision making.</p> <p>No change to the Management Plan is recommended.</p>	None.
MP021	Pembrokeshire County Council	Also, on page 19 for the same policy – item q) – insert the word adverse after word 7, to match up with the reference to a significant adverse effect later in the same sentence.	<p>Agree. Amend E1 (q) to: <i>E1 (q) Resist proposals which have a likely significant adverse effect (either alone or in combination with other plans and projects) upon a European site unless it can be ascertained following an appropriate assessment that they will have no significant adverse effect on the integrity of the site(s) concerned.</i></p>	None (clarification).
MP022	Pembrokeshire County	Page 20, Policy H1 – Conserve and enhance landscapes of particular		

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	Council	historic interest, scheduled monuments, listed buildings and their settings. In the policy title and under point b) insert the word 'ancient' between 'scheduled' and 'monument'.	Disagree. The current convention is to refer to "scheduled monuments". No change to the Management Plan is recommended.	None.
MP023	Pembrokeshire County Council	[H1] Consider adding 'Conservation Areas' into the policy title.	Agree. Amend H1 policy to: <i>H1 Conserve and enhance landscapes of particular historic interest, Conservation Areas, scheduled monuments, listed buildings and their settings.</i>	None.
MP024	Pembrokeshire County Council	[H1] Under point b) add the word 'archaeological' between 'local' and 'significance'.	Agree, although it is suggested that 'heritage' is a preferable term here. Amend H1 (b) to: <i>H1 (b) Monitor the condition of scheduled monuments and sites of local heritage significance.</i>	None.
MP025	Pembrokeshire County Council	[H1] Under point i) add 'and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken'.	Agree. Amend H1 (i) to: <i>H1 (i) Monitor heritage crime and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.</i>	None.

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			<p>Additional officer comment: for consistency, amend E1 (r) to: <i>E1 (r) Monitor wildlife crime and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.</i></p>	None.
MP026	Pembrokeshire County Council	Page 22, Policy N1 – Contribute to a low carbon economy for Wales and adapt to climate change – item b) add ...'and awareness of circular economy principles'.	<p>Agree. Amend N1 (b) to: <i>N1 (b) Manage development in accordance with Pembrokeshire Coast National Park Authority's Local Development Plan 2 policies and guidance in relation to soil, water, air and earth heritage, support for appropriate renewable energy development and energy efficiency measures, flooding and coastal inundation, development in coastal change management areas, relocation of development affected by coastal change, sustainable design and drainage and waste, supported by supplementary planning guidance where needed, promoting waste efficiency through the waste hierarchy and by raising awareness</i></p>	

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			<i>of circular economy principles.</i>	None (clarification).
MP027	Pembrokeshire County Council	Page 23, Policy N3 – Conserve and enhance soils and natural carbon storage – item b) add ... ‘and protect the best and most versatile agricultural land (that in ALC grades 1, 2 and 3A)’.	<p>Agree. This clarifies national planning policy as set out in Planning Policy Wales 10 (December 2018).</p> <p>Amend N3 (b) to: <i>N3 (b) Support soil conservation, management of peat soils, wetland protection, conservation and expansion of semi-natural habitats, trees in the landscape, reduction of artificial inputs and protect the best and most versatile agricultural land from development*.</i> * [New footnote] <i>Land of grades 1, 2 and 3a of the Agricultural Land Classification system (Planning Policy Wales provides detailed policy prescriptions to be applied).</i></p>	None.
MP028	Natural Resources Wales	Natural Resources Wales (NRW) welcomes this comprehensive new Management Plan, including its supporting documents, and the important links it makes to, for example,		

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		the Natural Resources Plan, the Pembrokeshire Wellbeing Plan and to the principles of Sustainable Management of Natural Resources.	Noted with thanks.	None.
MP029	Natural Resources Wales	<p><u>Natural Beauty</u> The Natural Beauty of the Park is the basis for its designation and attraction providing so many benefits to society. We would therefore welcome greater emphasis on and ambition for the maintenance and enhancement of natural beauty using all available evidence eg LANDMAP visual and sensory layer has been updated after a 10 year interval and could provide some insights in enhancing natural beauty. This might helpfully be included in your State of the Park report alongside relevant direction from the Landscape Character Assessment carried out for the Authority.</p>	<p>Noted. It will be useful to explore the updated LANDMAP data with NRW during the Plan period. We envisage that this analysis will also feature in the South West and Marine Area Statements.</p> <p>The State of the Park report includes a number of relevant sections on natural beauty, in particular pages 8-17 of the State of the Park Report (which map and summarise Landscape Character Assessment characteristics and sensitivities), and pages 59-70 which characterise areas of the National Park in terms of biodiversity. This work is intended to add actionable local management value to the LANDMAP framework.</p>	

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			No change to the draft Management Plan is recommended.	None.
MP030	Natural Resources Wales	<p><u>Area Statements</u> NRW is consolidating stakeholder input into Area Statements which will be published online in March 2020. The Area Statement will provide useful data and evidence on the challenges, risks and opportunities of natural resource management in an Area. Although the timing is unfortunate for this Plan, it is hoped that the Statement may be useful for action planning, future prioritisation and on-going reviews or context.</p>	<p>Noted and welcomed.</p> <p>National Park Authority staff have also benefited from Management Plan / South West and Marine Area Statement meetings prior to the Management Plan consultation (30th May 2019) and during the consultation (South West Area Statement event in Pembroke Dock, 3rd October 2019) and follow up correspondence / calls with a member of Natural Resources Wales' Planning, Landscape, Energy and Decarbonisation Team.</p>	None.
MP031	Natural Resources Wales	<p><u>SMNR</u> There could be added value to the Plan to show how the principles of SMNR have been considered eg</p>		None.

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		<p>Adaptive Management. The Plan introduces 'desired policy impacts' 1.15 page 7 to evaluate the direction of travel. Are these impacts clearly stated? Would their evaluation be sufficient to inform adaptive management?</p> <p>Scale. Working beyond boundaries with neighbouring Authorities, Groups and initiatives for wider resilience. Perhaps consideration could be given to seeking a buffer area for the coastal strip as intensive agriculture could intensify in coming years.</p>	<p>Describing / specifying and monitoring the impacts will be essential to assessing effectiveness of the Management Plan in generating additional partnership impact. The impacts are also offered as a basis for partners to set corporate plan targets and metrics.</p> <p>The NPA, Pembrokeshire County Council and a range of other partners work through the Pembrokeshire Nature Partnership to address biodiversity challenges. The need to work beyond geographical boundaries when appropriate is embraced by the NPA, however intensive agricultural practices often exist right up to the coastal slope and the cost of implementing conservation land management on highly productive agricultural land is often prohibitive if even an option. Welsh Government's Sustainable Farming Scheme will be</p>	

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		<p>Collaboration. Wales' Designated Landscapes are good at collaboration but faced with Climate and environment emergencies there is scope to do more. The Parks might want to consider a collaboration for biodiversity action along the lines of the National Association of AONB's Colchester Declaration.</p>	<p>critical to achieving biodiversity gain on such land.</p> <p>The Colchester Declaration can be found on the National Association of Areas of Outstanding Natural Beauty's website⁹. The three national park authorities in Wales have previously (2013) collaborated on a climate change position statement and most recently PCNPA Members received a report on the contribution of the Authority to meeting the challenges of the climate emergency (report no 40/19, 13th October 2019). The report outlines how the Authority across its functions is currently responding to climate change, via carbon reduction and sequestration, adaptation and mitigation. It also sets out recommendations on where potentially the</p>	

⁹ https://landscapesforlife.org.uk/application/files/7815/6326/2583/The_Colchester_Declaration.pdf

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		<p>Engagement. Can new technology / social media assist in boosting engagement in Plan development such as in Eryri?</p>	<p>Authority can make further reductions or impact, taking in to account the actions in strategic programmes such as <i>Prosperity for All: a Low Carbon Wales</i>.</p> <p>The NPA will continue to liaise and collaborate with the other protected landscapes in Wales. While the impacts to reduce greenhouse gas emissions listed in the draft Management Plan (e.g. policy N1 Contribute to a low carbon economy for Wales and adapt to climate change) are primarily local measures, there is considerable scope under policy E1 (Protect and improve biodiversity quality, extent and connectivity at scale).</p> <p>The Authority engagement action plan group (staff) arose partly due to the recognition of the need for engagement on National Park management to become more of an ongoing conversation, between</p>	

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		<p>Evidence. A new report could be helpful: LANDMAP, landscape and climate change https://cdn.naturalresources.wales/media/688626/eng-landmap-landscape-and-a-changing-climate.pdf?mode=pad&rnd=131989289330000000 Also there are two existing Tranquility Maps again with a 10 year interval.</p>	<p>plan reviews, and with continuous learning. One of the long term themes in the action plan identified is online Engagement and Interpretation:</p> <ul style="list-style-type: none"> • Effective online engagement mechanisms are in use that enable people to find out more, interact and feedback about the Authority and Park • Our approach is reflective of how diverse audiences engage with different online platforms <p>Noted with thanks. It will be useful to explore these materials with Natural Resources Wales during implementation, for example in the context of the opportunities / challenges mapping.</p>	

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		Analysis of these may provide some useful evidence to support Dark Skies interventions.	No change to Management Plan is recommended.	None.
MP032	Natural Resources Wales	The recent Brexit scenarios work to map likely implications on land management led by [redacted] showed potentially huge impacts for Wales. Given this it is surprising not to see Brexit on the list of key Opportunities and Challenges for the National Park or at least consideration of likely impacts on the Special Qualities of the Park.	<p>Noted. Brexit has been considered (e.g. Section 14 of the State of the Park Report) including the Brexit mapping work referred to.</p> <p>Britain's exit from the European Union brings opportunities and challenges which are reflected in the list included in the draft Management Plan. That is, Brexit was 'unpacked' into specific aspects relevant to National Park purposes, for example</p> <ul style="list-style-type: none"> • enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment • conserving and improving soil health and enhancing natural carbon stores • addressing the impacts of invasive species and plant pathogens • reducing greenhouse gas emissions 	

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			<p>and adapting to climate change</p> <ul style="list-style-type: none"> • reducing pollution from nitrates and ammonia • managing risks to heritage assets, including historic landscapes • promoting Welsh language and dialects <p>While in general it is expected that there may be additional intensification pressure (dairy sector) on lowland areas, and potential withdrawal from upland areas (sheep sector) there are many second order and human effects which it is not considered appropriate to speculate on in the Management Plan although of course this is relevant to mitigation of the human and financial impacts of changes in the agricultural sector and the Authority's duty in pursuit of National Park purposes.</p> <p>Welsh Government's proposed Sustainable Farming Scheme has great</p>	

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			<p>potential to contribute to impacts specified in the draft Management Plan as well as providing a potential new income stream to land managers after Britain's exit from the European Union. The Welsh National Park Authorities, in their response to the <i>Sustainable Farming and Our Land</i> consultation, have proposed detailed discussion with Welsh Government about co-designing the scheme, developing and delivering pilot and demonstration projects, as a means of delivering Management Plans and Welsh Government's intentions set out in "Valued and Resilient".</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP033	Natural Resources Wales	There is also much discussion on the subject of ecosystem resilience but how will enhancing resilience affect the Park landscape and its Special Qualities? Perhaps this is again a research	A resilient landscape (one in which natural processes, semi-natural habitats and associated species are restored over a greater overall area) would be expected to look, sound and generally 'feel' different.	

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		<p>subject for the 3 Parks to collaborate upon? There may be a requirement to share new perspectives with stakeholders or education / engagement prior to implementing new approaches for enhanced resilience post Brexit.</p>	<p>People’s perceptions and expectations of landscape (naturalness, wildness, tranquility etc.) vary, and will continue to, especially in the context of climate change, but in general a resilient landscape would be expected to enrich or restore special qualities and generally add to the people’s potential enjoyment and understanding of the National Park.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP034	Lamphey Community Council	<p>This document doesn’t include Freshwater East and this should be included.</p>	<p>A follow-up email was sent to the respondent seeking clarification on any particular themes of interest or of concern in order to address them satisfactorily in the National Park Management Plan and / or elsewhere. The following clarification was received:</p> <p>“The bit that we wanted changing was footnote 11 at the bottom of the page [page</p>	

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			<p>15] which refers to a list of sites where recreational pressures should be managed. Specifically Policy W1f refers to inappropriate use of watercraft. As there is the issue of inappropriate use of jet skis (personal water craft) at Freshwater East Bay, we felt that Freshwater East should be included in the list of sites where recreational pressures should be managed. In fact a meeting was recently held by PCNPA with other stakeholders into this specific issue at Freshwater East Bay. There are conflicts between irresponsible jet ski users and other users of the bay such as swimmers, SUPs and kayakers.”</p> <p>Agree. Amend the footnote 11 in the draft Management Plan to: <i>Sites include Abereiddi, Abermawr, Barafundle and Stackpole Quay, Cwm yr Eglwys, Freshwater East, Freshwater</i></p>	

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			<p><i>West, Martin's Haven, Porthgain, Pwllgwaelod, St Justinian, Strumble and Whitesands.</i></p> <p>Amend this policy footnote in the Sustainability Appraisal and Equality Impact Assessment for this policy footnote.</p> <p>(Note: Freshwater East is already marked on the opportunities / challenges maps for these recreational pressures.)</p>	None (clarification).
MP035	Friends of Pembrokeshire Coast National Park	<p>The Friends of Pembrokeshire Coast National Park is an independent voluntary charity, founded in 1991 to help protect, conserve and enhance the Pembrokeshire Coast National Park for all who live, work or visit the Park, both now and in the future.</p> <p>We are grateful for the opportunity to comment on the plan. We are particularly pleased to see the reference to ongoing conversations as</p>		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>a critical friend to the National Park Authority we would welcome an ongoing dialogue to further shape this important document.</p> <p>We understand this is a period of uncertainty and operational stress however there is huge public support for our National Park and a real desire to be ambitious, particularly around the state of our natural world and the services that underpin it. We recognise the challenge of aligning the plan with emerging policies and plans such as NRW Area Statements and wider government initiatives.</p> <p>We also recognise the good work carried out by all those involved in the day to day management of the Park.</p>	Noted with thanks.	None.
MP036	Friends of Pembrokeshire Coast National	<p>Our response to the structure of the Plan</p> <p>Since our feedback earlier this year we feel there remain real structural flaws in</p>		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
	Park	<p>the plan.</p> <p>Management of the National Park is confronted by the broad, global issues facing the natural world, alongside the impacts on these changes to local people and their communities here in Pembrokeshire.</p> <p><i>Valued and Resilient</i> (2018) is the latest guidance from Welsh Government for designated landscapes. This statement challenges National Parks to lead the way in delivering landscape scale action and this ambitious spatial approach is not clearly expressed in the draft plan. This guidance focuses on a range of challenges ranging from tackling climate change and improving biodiversity to enhancing cultural heritage and encouraging physical activity by promoting access to the National Park.</p>	<p>A meeting with the Friends of the Pembrokeshire Coast National Park took place on 24th January 2019. A follow-up meeting took place on 26th February 2019. The Friends' views were sought informally on the content of an early draft Management Plan (version following the National Park Authority Member workshop of 3/4/19).</p> <p>The first opportunity / challenge at para 1.13 ("enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment") was inserted partly as a result of these discussions and in acknowledgement of a key challenge identified in the Campaign for National Parks' June 2018 report <i>Raising the bar: improving nature in National Parks</i>.</p> <p>The Plan is evidence-based (key evidence</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>The plan needs to realise these ambitions through robust, evidence based decision making, with clear, measurable outcomes based on evidence.</p> <p>We strongly disagree with the statement in 1.15 that outcome targets cannot be set in dynamic landscapes – without targets very little tends to happen. Desired policy impacts are too weak and impossible to measure. The background papers are full of carefully measured data and this surely needs to be used to set targets and measure progress. For example in <i>The State of Wildlife in Pembrokeshire 2016</i>, of the 23 monitored features only 3 were rated as being in GOOD condition. The majority of features assessed are in poor or moderate condition and the overall trend is still declining. Accurate assessment is hampered by a paucity</p>	<p>sources used in the State of the Park Report are summarised at Annex C and include <i>The State of Wildlife in Pembrokeshire 2016</i>) and para 1.15 of the draft Management Plan is not intended to suggest that there will be no outcome monitoring, rather that there should be no upper bound for improvement for the state of the natural and historic resources of the National Park as might be implied by an outcome target.</p> <p>The overall aim of Welsh Government’s Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) project, led by the Centre for Ecology and Hydrology, is to deliver a programme of monitoring and modelling which collects data across the Welsh landscape and links any changes to their impacts on a wide range of benefits including their economic consequences. The programme will be a</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>of robust, long term data. This raises alarm bells and this should be tackled clearly within the plan, following the evidence and resulting in action and clear outcomes. Without a description of what success looks like and how progress will be measured nobody is accountable. This evidence based approach should be fundamental to all activities. Welsh Government is clearly focused on value for money and as new schemes develop, such as the Sustainable Farming Payment scheme, Management Plans will need to have robust data in order to play a pivotal role in shaping landscapes and influencing the management of natural resources.</p> <p>The draft plan appears to be more of a policy framework rather than a</p>	<p>key source of data for State of Natural Resources Reporting and will also undertake modelling for the EU exit process and the design and evaluation of programmes delivering to the Natural Resources Policy, notably the Sustainable Farming Scheme. The three National Park Authorities in Wales are project partners in ERAMMP.</p> <p>The impacts (outputs) listed are the proposed means to achieve the policies over the Plan period. These are for individual organisations and for partnerships and would be measured through corporate planning processes and through management planning reporting.</p> <p>The impacts are intended to encourage wider engagement on and adaptive delivery. It is not accepted that they are impossible to measure. However there is</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>Management Plan. It largely reflects what is already happening in the park rather than developing the future direction and focus.</p> <p>Framing the plan around a set of policies and impact areas (L1, W1, E1 etc.) is immensely confusing and doesn't clearly lead anywhere. Many of the actions are unspecific and centre around 'support, encourage, interpret, manage etc.'</p>	<p>an issue here for further discussion as part of the ongoing conversation during Management Plan implementation and as a basis for reporting / celebration of achievements (para 1.5 Annex A to the draft Management Plan). Specific suggestions on the scope and adequacy of the ambitions that the impacts are intended to characterize would be welcomed.</p> <p>Amend the end of para 1.15 of the draft Management Plan by adding "Progress will be assessed through annual reports and State of the Park reporting."</p>	None (clarification).
MP037	Friends of Pembrokeshire Coast National Park	<p>A farmer looking for guidance or trying to understand his/her role within the National Park would not find this plan useful in describing or linking to relevant activities or programmes. Likewise a small business planning to develop sustainably and looking to gauge what this means in the National</p>	<p>Strategically significant programmes / partnerships are mentioned where relevant throughout the draft Management Plan. However, as a plan for the Park area, not just for the National Park Authority, it was generally not considered appropriate to add detail about individual partners' projects. Such projects tend to change</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		Park would be unlikely to find the plan useful.	<p>over five years (the Management Plan period) and up to date information is generally readily available from partners' corporate plans and / or their websites. This includes information on the National Park Authority's replacement Local Development Plan for the National Park (in regard to which the approach taken during Management Plan drafting has been not to anticipate or prejudice any specific policy outcomes arising from that process).</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP038	Friends of Pembrokeshire Coast National Park	A list of partner organisations which have helped develop the plan would demonstrate the breadth of input and responsibility. This group approach could then be built on in future plan development. These partnerships will be instrumental in helping to deliver the Plan's vision and objectives.	<p>A draft Report of Consultations accompanied the consultation draft Management Plan. This detailed all the engagement that had taken place, with named stakeholder organisations and groups.</p> <p>A Reference Group was set up during the</p>	

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		<p>A further way of involving all the relevant partners effectively would be to establish some form of local advisory group or partnership board. This would include key stakeholders such as farmers, industry, NRW and others with a view to reviewing progress on the delivery of the Management Plan on an ongoing basis and championing specific issues.</p> <p>A set of high priority actions to spearhead this new plan would provide focus and the option of 'launching' the plan across the National Park as well as highlighting the current pressures and opportunities. The draft plan as expressed would just quietly emerge. It would benefit from a clear, strong executive introduction which would encapsulate the state of this particular park and present the vision and</p>	<p>plan drafting process. Members are relevant authorities indicated by Section 62 of the Environment Act 1995 and are: Amgueddfa Cymru National Museum Wales; Dyfed-Powys Police; Hywel Dda University Health Board; Mid and West Wales Fire and Rescue Service; Natural Resources Wales; Pembrokeshire County Council; Port of Milford Haven. It is likely that the group will continue to meet during implementation.</p> <p>It is accepted that there is a need to engage on National Park management with a more representative range of stakeholders and to become more of an ongoing conversation with continuous learning. An engagement action plan group (National Park Authority staff) arose partly in response to this.</p> <p>It is also a Welsh Government priority, as</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		ambition over a timescale.	<p>set out in <i>Valued and Resilient</i> (2018).</p> <p>Shared ambitions for national parks and national park authorities, contained in <i>Valued and Resilient</i>, are listed in Annex A of the Management Plan. The 70+ impacts listed in the Plan also represent ambitions for the Plan period (other ambitions for the Authority will be contained in its annual corporate plans).</p> <p>Amend the foreword to include reference to opportunities / challenges.</p>	None.
MP039	Friends of Pembrokeshire Coast National Park	The plan adopts a vision to 2050 but there's little evidence of how this is built in. The plan for climate change, for example, needs to feature forecast and adaptation scenarios and cross reference to other activities and evidence.	Disagree. The example given (climate change) is extensively addressed within the Sustainability Appraisal and the State of the Park Report. Desired management impacts, relating to local and national issues, are given in the draft Management Plan (e.g. N1 (a) to (d)). Further discussion as part of the ongoing conversation during Management Plan implementation (action	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>planning) would be welcomed.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP040	Friends of Pembrokeshire Coast National Park	<p>In our response to the recent Welsh Government consultation on sustainable farming we made the point that their scheme needed to take account of the National Park Management Plan. We would expect to see success criteria for the special qualities and a plan that sets out how these are to be achieved and by whom. For example, having identified coastal splendour as a special quality it does not get a further mention in the plan.</p> <p>A Management Plan would be expected to identify the current status of these qualities, any pressures or future predicted conflicts, and how the plan would address them. We would</p>	<p>Welsh Government's proposed Sustainable Farming Scheme has great potential to contribute to impacts specified in the draft Management Plan (see Annex para 1.8) as well as providing a potential new income stream to land managers after Britain's exit from the European Union. Policy E1 (o) is to "Support local delivery of the Welsh Government's proposed sustainable agriculture scheme." (This has since become known as the Sustainable Farming Scheme.)</p> <p>The Welsh National Park Authorities, in their response to the <i>Sustainable Farming and Our Land</i> consultation, have proposed detailed discussion with Welsh Government about co-designing the</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>expect the themes to address the special qualities, the purposes and opportunities and threats.</p>	<p>scheme, developing and delivering pilot and demonstration projects, as a means of delivering Management Plans and Welsh Government's intentions set out in "Valued and Resilient".</p> <p>The draft Management Plan is supported by a State of the Park report and a Sustainability Appraisal. These include references to national and local landscape assessment / characterisation and are influential in setting the scene for the opportunities, challenges and responses (impacts) identified.</p> <p>The National Park Authority will work with partners to implement and monitor the Management Plan. Partners will be encouraged to adopt the Plan and / or the impacts within it and to celebrate those contributions. An action plan which highlights annual campaigns or themes, for example by focusing on heritage,</p>	<p>None.</p>

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>conservation, or responses to climate change, will be prepared. The action plan can also provide a focus for funding bids.</p> <p>Technical update: amend the Management Plan where relevant to refer to the “Sustainable Farming Scheme”.</p>	
MP041	Friends of Pembrokeshire Coast National Park	The land use planning dimension of the National Park Management Plan is put into effect through the Local Development Plan. We would like to see the Management Plan having the ambition to become a far more substantial and focused document that was aligned with similar plans across designated landscapes in Wales.	Noted. This version of the Management Plan has deliberately stepped away from the detailed planning approach with the aim of making intentions more accessible, determining more readily if they are necessary and sufficient, and fostering a more adaptive approach to management (by being less prescriptive about the ‘how’ for partner organisations). The accompanying assessments, reports and maps include a considerable amount of detail. Please also see below regarding the need to prepare an Action Plan.	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			No change to the draft Management Plan is needed.	None.
MP042	Friends of Pembrokeshire Coast National Park	<p>Developing a spatial approach to the expression of the special qualities alongside the other spatial information that now exists would begin to build up a much clearer sense of what can be achieved and where the work should focus in the near future.</p> <p>If this could be acknowledged as an ambition within the plan it would set a useful direction for a wide range of potential projects.</p>	<p>Evidence in the form of opportunities / challenges maps and state of the Park information support the Management Plan (and were available as part of the consultation) and will evolve alongside its implementation.</p> <p>The State of the Park report includes maps and summaries of Landscape Character Assessment characteristics and sensitivities. Original material characterising the National Park in terms of biodiversity are included on pages 59-70 and can be used to influence the design of specific projects.</p> <p>Specific comments on the maps (which will be kept updated during the Plan period) would be welcomed.</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
			<p>The intention is also to progress areas of work through preparation of an Action Plan. This will help to progress the work already done as suggested.</p> <p>No change to the draft Management Plan is needed.</p>	None.
MP043	Friends of Pembrokeshire Coast National Park	We would welcome further discussion on any aspects of the above.	<p>Noted with thanks. A number of areas for further discussion are identified above.</p> <p>No change to the draft Management Plan is recommended.</p>	None.
MP044	Cadw	Thank you consulting Cadw on the draft Pembrokeshire Coast National Park Management Plan. Our Senior Historic Environment Planning Officer and our Regional Inspector note that the management plan includes a section (number 5) Celebrating Heritage. This gives a list of actions aimed to conserve, maintain and monitor heritage assets. The implementation of		

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		these actions will protect the historic environment. The plan also includes continuing to monitor heritage crime – a very welcome action. We have no other comments to make.	Noted with thanks.	None.
MP045	Pencaer Community Council	<p>Having now read the consultation document it is noted that the proposals are basically for no major changes within the National Park Management Programme.</p> <p>However, there are two references, which council members felt should be drawn to the Authority's attention, These are bio-diversity and support for the Welsh Governments proposed sustainable agriculture scheme.</p> <p>In terms of bio-diversity members wish to point out that there is substantial problem over natural predator within the Park area, both on the ground and</p>	<p>Biodiversity declines are of great concern. These include declines in species groups in addition to those mentioned in the response (for example butterflies). The <i>Nature Recovery Plan for Wales</i> lists four attributes of resilience: increasing diversity; increasing ecosystem extent through reducing fragmentation; increasing connectivity within and between ecosystems, and improving habitat</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>in the air. Much of the small animal biodiversity normally experienced in the Park area has disappeared, for example, there are very few hedgehogs, ground mammals and in particular ground nesting birds. It is believed that the main causes of such losses are the badger and fox predators, together in some cases with others who remove eggs, young mammals and in particular hedgehogs from the area.</p> <p>The same situation exists in the air with a number of predator birds, namely, ravens, rooks, carrion crows, magpies, all predating on the small bird population. There are obviously other predators such as peregrine falcons, sparrow hawks, etc., but it is believed their numbers being much lower than the other birds set out above do not</p>	<p>condition, and it is intended that actions to fulfil these will halt and reverse biodiversity declines.</p> <p>However, natural predation is not considered to be a primary threat when compared to human factors. The <i>State of Nature 2019</i> (State of Nature Partnership, 2019) for example cites the following headline pressures on wildlife: agricultural management (increasing productivity), urbanisation, pollution, hydrological change, woodland management and invasive non-native species, with climate change expected to drive widespread changes in the abundance, distribution and ecology of Wales' wildlife in future.</p> <p>No change to the draft Management Plan is recommended.</p>	<p>None.</p>

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>have the same effect on the small bird population.</p> <p>This problem of animal bio-diversity as things stand at the moment is more likely to get worse than better.</p>		
MP046	Pencaer Community Council	<p>On page 19 under the paragraph headed 'A resilient Park' item o. refers to the Welsh Government's proposed sustainable agriculture scheme. The document published by Welsh Government is a very substantial document of over 150 pages. It includes proposals of a fairly drastic nature, and in particular the cessation of the existing basic farm payment by the year 2022. Many commentators and interested parties view this most immediate cessation of the farm payment as unwise. Furthermore, the proposals for environmental payments etc. are likely to be fairly complicated</p>	<p>Noted. The three National Parks in Wales have responded to the Welsh Government's consultation <i>Sustainable Farming and Our Land</i>. This makes a number of points on the subject of transition and funding, and it is our understanding that Welsh Government has signaled that finance will continue to flow until new arrangements start. National Parks Wales' response also emphasizes the importance of maintaining / cultivating local strengths and land manager relationships in delivery. The Authorities</p>	

Ref.	Respondent	Representation on the draft Management Plan	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment)
		<p>and take considerable time to work out. Particularly as England is extending the basis of the single farm payment, although on a reducing scale for 7 years, Welsh Government should look at a much longer transition period for the introduction of its new scheme.</p> <p>These comments have been considered by the Pencaer Community Council and cover their current opinions, for submission to the Pembrokeshire Coast National Park.</p>	<p>would wish to continue to support land managers in their delivery of shared outcomes.</p> <p>No change to the draft Management Plan is recommended.</p>	<p>None.</p>

APPENDIX 13 – REPRESENTATIONS ON THE CONSULTATION DRAFT SUSTAINABILITY APPRAISAL

Ref.	Respondent	Representation on the draft Sustainability Appraisal	Officer comments and recommendations	Assessment of effects (for Habitats Regulations Assessment and Equality Impact Assessment)
SA001	Uzmaston, Boulston and Slebech Community Council	<p>4(b) Do you agree with the Sustainability Appraisal's assessment of the impacts of the draft Management Plan on the Welsh language?</p> <p>Yes</p>	<p>Noted. No change to the draft Sustainability Appraisal is recommended.</p>	None.
SA002	Pembrokeshire County Council	<p>4. (a) Do you agree with the Sustainability Appraisal of the draft Management Plan?</p> <p>Yes.</p>	<p>Noted. No change to the draft Sustainability Appraisal is recommended.</p>	None.
SA003	Pembrokeshire County Council	<p>4(b) Do you agree with the Sustainability Appraisal's assessment of the impacts of the draft Management Plan on the Welsh language?</p>	<p>Noted.</p>	

Ref.	Respondent	Representation on the draft Sustainability Appraisal	Officer comments and recommendations	Assessment of effects (for Habitats Regulations Assessment and Equality Impact Assessment)
		Yes.	No change to the draft Sustainability Appraisal is recommended.	None.

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APPENDIX 14 – REPRESENTATIONS ON THE CONSULTATION DRAFT HABITATS REGULATIONS ASSESSMENT

Ref.	Respondent	Representation on the draft Habitats Regulations Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Equality Impact Assessment)
HRA001	Dyfed Archaeological Trust	<p>6. Do you agree with the Habitat Regulations Assessment of the draft Management</p> <p>Yes</p>	<p>Noted. No change to the draft Habitat Regulations Assessment is recommended.</p>	None.
HRA002	Pembrokeshire County Council	<p>6. Do you agree with the Habitat Regulations Assessment of the draft Management Plan?</p> <p>Yes.</p>	<p>Noted. No change to the draft Habitat Regulations Assessment is recommended.</p>	None.

APPENDIX 15 – REPRESENTATIONS ON THE CONSULTATION DRAFT EQUALITY IMPACT ASSESSMENT

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
EqIA001	Dyfed Archaeological Trust	<p>5(a) Do you agree with the Equality Impact Assessment of the draft Management Plan?</p> <p>Yes</p>	<p>Noted. No change to the draft Equality Impact Assessment is recommended.</p>	<p>None.</p>

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
EqIA002	Dyfed Archaeological Trust	<p>5(b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment? (Please see the “Actions and Implementation” tables at the end of the Equality Impact Assessment for a summary of these.)</p> <p>Opportunities for less mobile members of a community to engage with the historic environment/cultural heritage. One way of achieving this could be travelling ‘road shows’ bringing teaching collections to adults with dementia of mobility issues. Engaging all members of communities promoting inclusivity and the historic environment.</p>	<p>Noted.</p> <p>Amend and Update Equality Impact Assessment: Comments included in Equality Impact Assessment under H1 and to be actioned through Project level response in terms of H1a, WC1 and WM1.</p>	None.

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
EqIA003	Dyfed Archaeological Trust	Many opportunities for supporting policies on religion and belief as many historic monuments are 'sacred' in nature. A more 'open door' approach providing access to certain sites at certain times.	Noted. Amend and Update Equality Impact Assessment: Comments included in Equality Impact Assessment under H2 and to be actioned through Project level response to H2d.	None.
EIA004	Dyfed Archaeological Trust	Heritage trails/walks with children exploring historic landscapes. Generally speaking seeking out opportunities for community led excavations. Specifically to address the issue of promoting physical activity for girls - Land army days working on a farm?	Noted. Amend and Update Equality Impact Assessment: Comments included in Equality Impact Assessment under W2 and to be actioned through Project level response to W2a.	None.
EqIA005	Pembrokeshire County Council	7. (a) Do you agree with the Equality Impact Assessment of the draft Management Plan? Yes. This is a very thorough and detailed assessment that shows how consideration of equalities issues has influence how the	Noted with thanks. No change to the draft Equality impact	

Ref.	Respondent	Representation on the draft Equality Impact Assessment	Officer comments and recommendations	Assessment of effects (for Sustainability Appraisal and Habitats Regulations Assessment)
		Management Plan has developed.	Assessment is recommended.	None.
EqIA006	Pembrokeshire County Council	<p>5 (b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment?</p> <p>We welcome the opportunity for further dialogue and note that we are already working in partnership with PCNPA and other organisations on the development of new Strategic Equality Plans.</p>	Noted with thanks.	None.

Annex 2

Pembrokeshire Coast National Park

~~Consultation draft~~ Management Plan 2020-2024

~~Consultation period August 1st – October 31st 2019~~

~~Approved Final Draft for approval for consultation~~ by the
Pembrokeshire Coast National Park Authority, 11th December 2019
~~5th June 2019~~

<https://www.pembrokeshirecoast.wales>

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Foreword

The Pembrokeshire Coast National Park is the only UK national park designated primarily for its coastline. It's here - where land and sea meet - that the National Park is at its most wild and exhilarating.

The National Park is also a landscape shaped by people. [The Park#](#) is a national asset, ~~and which~~ celebrates its 70th anniversary in 2022.

In 2018, Welsh Government outlined the key priorities for protected landscapes in Wales¹. They are places of high natural and cultural value. They are for everyone in Wales. And they are essential to delivering national and local environmental, social and sustainable economic development ambitions².

This ~~draft~~ Management Plan sets out action in pursuit of the National Park purposes of conservation, enjoyment and understanding. It builds on previous plans and ~~incorporates on~~ learning from conversations with partner organisations and the public. Prepared by the Pembrokeshire Coast National Park Authority with stakeholders, it ~~is has been developed as~~ a partnership plan.

Key opportunities and challenges identified in the development of this Plan include:

- enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment
- conserving and improving soil health and enhancing natural carbon stores
- addressing the impacts of invasive species and plant pathogens
- reducing greenhouse gas emissions and adapting to climate change
- reducing pollution from nitrates and ammonia
- protecting dark night skies
- managing risks to heritage assets, including historic landscapes
- promoting Welsh language and dialects
- providing outdoor learning opportunities, in particular for children
- providing sustainable outdoor recreational opportunities for a full cross-section of society and increasing the frequency of participation
- managing potential / actual recreational pressures such as those arising from unauthorised camping and congestion

Comment [A1]: MP038

The Plan period (2020-2024) promises to be one of major change, of both opportunity and challenge. Wales' new legislative and policy framework – with

¹ *Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks (2018)*

² *Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks (2018)*

national well-being goals and objectives, regional area statements and principles for sustainable management of natural resources³ - will help partners to respond.

~~The National Park Authority is committed to providing meaningful opportunities to participate in the preparation of plans and decision-making. ,and People's contributions at every stage of Plan preparation are appreciated and valued.,and The National Park Authority looks forward to hearing your views during the consultation period, and. But we also. The Authority we wishes antss~~ to continue and build on ~~these~~ conversations and relationships during Plan implementation. The Plan is only the start.

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³ Well-being of Future Generations (Wales) Act 2015, Environment (Wales) Act 2016, Historic Environment (Wales) Act 2016, Planning (Wales) Act 2015 and Welsh Government's *Natural Resources Policy* (2017).

1. Welcome to Pembrokeshire Coast National Park

A living, working landscape

1.1 UK National Parks are exceptional landscapes. Their, with the purposes areof:

- conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park
- promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public⁴

Map: Pembrokeshire Coast National Park



⁴ In the event of an irreconcilable conflict between the purposes, conservation has greater weight (the 'Sandford principle').

1.2 Residents and visitors identified what they consider to be the special qualities of the National Park, and factors affecting them, as the first stage in the preparation of ~~the an earlier previous~~ Management Plan ~~and alongside the~~ first Local Development Plan for the National Park. The special qualities are:

- accessibility
- coastal splendour
- cultural heritage
- distinctive settlement character
- diverse geology
- diversity of landscape
- islands
- remoteness, tranquillity and wildness
- rich historic environment
- richness of habitats and species
- space to breathe
- the diversity of experiences and combination of individual qualities

Landscapes underpin people's wellbeing, prosperity and culture. They support the processes that help produce food, regulate climate, reduce flooding and store carbon.

1.3 Pembrokeshire Coast National Park Authority works closely with many other organisations and individuals to achieve National Park purposes. The National Park Authority has a duty to seek to foster the social and economic wellbeing of National Park communities in its pursuit of the purposes.

Wales' National Parks contribute £1 billion to Wales' economy⁵, with a large amount of this coming from visitor spending.

£346 million was generated through visitor and tourism business spending within the Pembrokeshire Coast National Park boundary in 2017, supporting nearly 11,000 full-time equivalent jobs in the National Park and its economic influence area⁶.

Themes for partnership action

1.4 The Environment Act 1995 requires the National Park Authority ~~is required~~ to prepare a Management Plan for the National Park⁷. ~~This consultation draft National Park Management Plan covers the period 2020-2024.~~

1.5 The Management Plan will pursue National Park purposes through partnership action across five complementary themes.

⁵ [Valuing Wales' National Parks 2013](#), National Park Authority

⁶ Tourism economic impact research undertaken for Pembrokeshire Coast National Park by Global Tourism Solutions (UK) Ltd.

⁷ Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995).



A national asset
A landscape for life and livelihoods

Landscapes for everyone
Well-being, enjoyment and discovery

A resilient Park
Protecting and restoring biodiversity

A place of culture
Celebrating heritage

Global responsibility
Managing natural resources sustainably

- 1.6 These ~~se five~~ themes ~~are based on~~ ~~reflect~~ National Park purposes and align with:
- the Planning (Wales) Act 2015
 - the Well-being of Future Generations (Wales) Act 2015
 - principles of sustainable management of natural resources set out in the Environment (Wales) Act 2016⁸
 - the Historic Environment (Wales) Act 2016
 - Welsh Government's *Natural Resources Policy 2017*⁹
 - Welsh Government's 2018 policy statement *Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks*

1.7 Sections 2 to 6 of the Management Plan take up each theme and set out ~~the~~ policies, and the impacts that will characterise the policies, ~~forever~~ the Plan period.

Annexes

1.8 Annex A provides more background to the National Park and the Management Plan. ~~It~~ ~~Here you can find information~~ ~~includes~~ ~~ing~~ relevant legislation, policy and guidance and how it is being taken into account; ~~more on the special qualities~~; lessons learned ~~since from~~ the previous Plan and how the key opportunities and challenges have been identified. Annex B lists some of the context (e.g. national priorities, other plans or programmes) taken into account in drafting the Management Plan. Annex C lists key data sources taken into account in drafting the Management Plan.

Statutory assessments

- 1.9 Three assessments accompany the ~~draft~~ Management Plan ~~and are being consulted on at the same time~~. ~~They are:~~
- Sustainability Appraisal (incorporating Strategic Environmental Assessment)

⁸ This is expected to become a legal requirement of national park authorities.
⁹ This identifies three national priorities: delivering nature-based solutions; increasing renewable energy and resource efficiency, and taking a place-based approach.

- Equality Impact Assessment
- Habitats Regulations Assessment

1.10 The assessments are available on the National Park Authority's website. A summary of the conclusions of the ~~consultation draft~~ Sustainability Appraisal are included in each section of this Management Plan.

Supporting material

1.11 The following material has been prepared in support of the ~~draft~~ Management Plan and is available via the National Park Authority's website.

Maps

1.12 These provide a spatial expression of some of the opportunities / impact areas listed under each policy of the Management Plan. The maps ~~are~~ not ~~form~~ part of the Management Plan ~~itself~~ and will be updated as necessary over the Plan period.

Background paper: the State of the National Park

1.13 A *State of the National Park* background paper ~~was has been~~ compiled in preparation of this ~~draft~~ Management Plan. This is supplemented by ~~the an~~ extensive environmental, social and economic baseline which forms part of the ~~consultation draft~~ Sustainability Appraisal. Key opportunities and challenges identified include:

- enabling ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment
- conserving and improving soil health and enhancing natural carbon stores
- addressing the impacts of invasive species and plant pathogens
- reducing greenhouse gas emissions and adapting to climate change
- reducing pollution from nitrates and ammonia
- protecting dark night skies
- managing risks to heritage assets, including historic landscapes
- promoting Welsh language and dialects
- providing outdoor learning opportunities, in particular for children
- providing sustainable outdoor recreational opportunities for a full cross-section of society and increasing the frequency of participation
- managing potential / actual recreational pressures such as those arising from unauthorised camping and congestion

1.14 These opportunities and challenges have given rise to the policy areas and impact areas ~~set out pecified~~ in ~~the is~~ ~~draft~~ Management Plan.

What will success look like?

1.15 'Success' is rarely a fixed quantity in a UK national park. Landscapes are dynamic, and knowledge, perceptions and expectations about them will change. For this reason, the Management Plan does not set outcome targets. Instead, it sets out a range of desired policy impacts which will be used to evaluate the direction and rate of travel over the Plan period. Progress will be assessed through annual reports and State of the Park reporting.

Comment [A2]: MP013 and MP036

- 1.16 Protected landscapes are a national asset and a key mechanism for delivering many of Welsh Government’s environmental, social and economic ambitions. Integrating the Management Plan with the regional and national policy context will ensure that the Plan contributes to Welsh Government’s national well-being indicators.

Terms explained

- 1.17 Some terms in this Plan may be unfamiliar or used in a particular way. A glossary is included below.

Active travel	Making journeys (generally within urban areas) by physically active means, e.g. walking or cycling. These are usually short journeys, e.g. from home to shops, school, work or to a bus stop or train station.
Affordable housing	Housing for sale or rent at prices below the market rate, provided for local people in inappropriate housing who cannot afford to resolve their housing needs in the open market.
Astrotourism	Tourism involving observation of the night sky and/or eclipse events.
Designated Bathing Water	A beach or body of inland water used by a large number of bathers meeting the criteria for designation under the (revised) Bathing Water Directive (2006/7/EC) and successfully designated as such.
Biodiversity	Refers to species diversity and richness – the totality of genes, species and ecosystems of a region, and the diversity within and between species, of ecosystems and the processes which underpin them.
Buildings At Risk	Listed buildings or structures which are assessed as in unsatisfactory condition on the basis of condition and occupancy or use. (See Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic Environment (Wales) Act 2016.)
By-catch	A fish or other species that is caught unintentionally while fishing. By-catch may be of a different species, or an undersized or juvenile individual of the target species.
Carbon store	A natural or artificial reservoir that accumulates and stores carbon-containing compound/s, e.g. soils and vegetation.
Catchment	A drainage basin, i.e. an area of land where rain collects and drains a common outlet, such as a river.
<i>Chalara</i> (ash die-back)	Disease of ash trees caused by the fungus <i>Hymenoscyphus fraxineus</i> . Chalara causes leaf loss, crown dieback and bark lesions in affected trees. The disease is usually fatal, either directly or indirectly by weakening the tree to the point where it succumbs more readily to attacks by other pests or pathogens. However, some ash trees appear to be able to tolerate or resist infection.
<u>Circular economy</u>	<u>An alternative to a traditional linear economy (make, use, dispose). Resources are kept in use for as long as possible, the maximum value is extracted from them while in use, and products and materials are recovered at the end of each service</u>

	life.
Citizen science	Scientific research in which the general public make a major contribution e.g. through survey.
Cloddiau	A raised earth bank, usually stone-faced, possibly with a hedge on top. Cloddiau have significant local importance and ecological value.
Connectivity	The degree to which the landscape facilitates species movement within it. Different species have different connectivity requirements, e.g. dormice require near-continuous suitable habitat.
Conservation Area	An area of special architectural and historic interest. (See Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic Environment (Wales) Act 2016.)
<i>Cymraeg 2050</i>	<i>Cymraeg 2050</i> is the ambition of the Welsh Government to see the number of people able to enjoy speaking and using Welsh reach a million by 2050 ¹⁰ .
Dark Sky Discovery site	Designated by the UK Dark Sky Discovery partnership (a network of national and local astronomy and environmental organisations), Dark Sky Discovery Sites are places that are away from the worst of any local light pollution, provide good sightlines of the sky and have good public access, including firm ground for wheelchairs. At "Milky Way" sites the Milky Way is visible to the naked eye and stargazing events may be held there.
Designated nature conservation sites	Sites of nature conservation interest which are protected by law.
Destination planning	A process of leading, influencing and coordinating the management of the aspects of a destination that contribute to the visitor experience, taking account of needs of visitors, residents, businesses and the environment.
Diffuse pollution	Pollution arising from a number of (perhaps minor) individual sources but having a significant collective impact.
Earth heritage	Geological and landform features, including soils and the processes which shape them. Features of national or regional importance may be designated as Geological Conservation Review sites (Sites of Special Scientific Interest) and Regionally Important Geological and Geomorphological Sites (a non-statutory designation administered by Natural Resources Wales).
Ecosystem	An ecosystem is a community made up of living organisms and non-living components such as air, water and soil.
Ecosystem resilience	The ability of an ecosystem to resist, respond or adapt to a perturbation or disturbance. The <i>Nature Recovery Plan for Wales</i> lists four attributes of resilience: increasing diversity; increasing ecosystem extent through reducing fragmentation;

¹⁰ Cymraeg 2050: <https://gov.wales/topics/welshlanguage/welsh-language-strategy-and-policies/cymraeg-2050-welsh-language-strategy/?lang=en>

	increasing connectivity within and between ecosystems, and improving habitat condition.
Equality Impact Assessment	A process designed to ensure that a policy, project or scheme does not discriminate against any disadvantaged or vulnerable people.
European Marine Site	A term used to describe Special Areas of Conservation (designated under the EU Habitats Directive) and / or Special Protection Areas (designated under the EU Birds Directive) that include marine habitats or species.
Flow regime	The variability of a river's discharge over a year.
Food security	Where enough safe and nutritious food is available to meet a population's requirements for a healthy life, in ways the planet can sustain into the future.
Habitats Regulations Assessment	Pembrokeshire Coast National Park Authority is a competent authority under the Conservation of Habitats and Species Regulations 2017 (draft legislation: The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019), and in accordance with those regulations the Authority must make an assessment of the National Park Management Plan prior to its adoption. This assessment is referred to as a Habitats Regulations Assessment and the regulations set out a clearly defined step-wise process which must be followed.
Heritage crime	Any offence which harms the value of heritage assets and their settings.
Intangible cultural heritage	The practices, representations, expressions, as well as the knowledge and skills that communities, groups or individuals recognise as part of their cultural heritage.
Invasive non-native species	A non-native animal or plant with the potential for significant impacts on biodiversity and / or human society and its economic interests. Invasive non-native species are recognised as one of the major causes of global biodiversity loss.
Listed Building	A building, object or structure that has been judged to be of national importance in terms of architectural or historic interest and has been registered as such.
Local Development Plan	The required statutory development plan for each local planning authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004. Local planning authorities have to set out their objectives in relation to development and use of land in their area and set out the general policies for the implementation of those objectives within their Local Development Plans. As well as having regard to national planning policy, the local planning authority has to take into account of regional planning policy and the authority's community strategy and the social, economic and environmental factors relating to the local area and global environment, by undertaking a sustainability appraisal of the Local Development Plan.
Major development	In National Parks and Areas of Outstanding Natural Beauty special considerations apply to major development proposals which are more national than local in character. This is defined

	in detail in Planning Policy Wales Edition 10.
Mitigation	Measures that avoid, reduce, remediate or compensate for negative impacts.
Pathogen	A bacterium, virus, or other microorganism that can cause disease.
Pembrokeshire Marine Code	Voluntary codes of behaviour and seasonal agreed access restrictions protecting Pembrokeshire's wildlife.
Pembrokeshire Nature Partnership	The Pembrokeshire Nature Partnership provides a strategic overview and forum for collaboration in implementing EU, UK, Welsh and local priorities for biodiversity action.
Permissive path	In addition to Public Rights of Way and shared use paths for cyclists and pedestrians, there are also many permissive paths in Pembrokeshire. These can take two forms. The first arises where a landowner agrees to allow the public to pass along a defined route, which is not a Public Right of Way. The second is where a landowner allows higher rights to be exercised along a Public Right of Way than those legally attributed to the route, such as permitting horse riding and or cycling along a public footpath.
Place-based approach	Welsh Government's <i>Natural Resources Policy</i> (2017) uses describes a place-based approach as a "focus on collaborative working to deliver better results at a local level" as a place-based approach (page 17 of the Policy). Area Statements and designated landscapes are viewed as playing "a key role in identifying local opportunities and constraints linked to the national priorities" (page 17 of the Policy).
Protected characteristics	Protected characteristics are the nine groups protected under the Equality Act 2010. They are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
Public goods	Products that individuals can consume without reducing their availability to other individuals, and from which no-one is excluded.
Public rights of way	A collective term for footpaths (a public right of way over which there is a right to pass on foot only); bridleways (a public right of way over which there is a right to pass on foot, bicycle and riding or leading a horse); Byways Open to All Traffic (a public right of way open to all types of user, including horse drawn carriages and motor vehicles); restricted byways (a public right of way which has bridleway rights of passage together with non-motorised vehicular rights of passage) and Shared Use Paths (dedicated routes shared by cyclists and pedestrians and sometimes horse riders, often alongside roads but also extending into the countryside).
Public Service Board	Established by the Well-being of Future Generations (Wales) Act 2015, Public Service Boards are responsible for preparing and implementing a Well-being Plan for their respective local authority area.
Reactive nitrogen	Biologically active forms of nitrogen including nitrogen oxides, ammonia, ammonium salts and urea, and nitrous oxide.

Scheduled Monument	A nationally important archaeological site or historic building, given protection against unauthorised change.
Seascape	A view which includes full or partial views of the sea.
Semi-natural habitat	Habitat which has been affected directly or indirectly by human activity, e.g. hay-meadows, heathland.
Social inclusion	Positive action to enable people and communities to fully participate in society or to benefit from a particular resource or service.
Social prescribing	Referral and signposting by medical practitioners to local, non-medical services in the community.
Soundscape	The acoustic environment as perceived, experienced or understood by people in any given context. This includes beneficial and neutral sounds as well as unwanted noise.
Special Area of Conservation	Areas designated under the 1992 EC Habitats Directive to protect habitats and species listed in Annex I (habitats) and Annex II (species) of the Directive.
Special Protection Area	Areas designated under the 1979 EC Birds Directive to protect rare, threatened or vulnerable birds that are listed in Annex I of the Directive, and their habitats.
Stakeholder	Interests directly affected by the Local Development relevant Plan – involvement generally through representative bodies.
Supplementary planning guidance	Supplementary information in respect of the policies in a Local Development Plan. Supplementary Planning Guidance does not form part of the Development Plan and is not subject to independent examination but must be consistent with the Plan and with national policy.
Sustainability appraisal / Strategic Environment Assessment	An appraisal of the economic, environmental, and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Sustainable intensification	The goal of increasing farm productivity while reducing environmental impacts and enhancing the ecosystem services that agricultural land provides to society.
Sustainable natural resources management	An approach set out in the Environment (Wales) Act 2016.
Waste hierarchy	An order of preference for action to reduce and manage waste; for example prevention and minimisation of waste are preferable to energy recovery or disposal.
Water body	Waterbodies include lakes, ponds, reservoirs, wetlands, rivers and streams.

2. A landscape for life and livelihoods

Policy L1: Conserve and enhance National Park landscapes and seascapes.

Impacts during the Plan period:

- a. Engage on an ongoing basis with a wide range of people about management of the National Park to achieve National Park purposes.
- b. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policy, regarding ~~in particular~~ major development, defence sites, lighting, amenity, employment, housing allocations, housing windfall sites and exceptional land releases for affordable housing to promote sustainable communities, in particular.
- c. Reduce the visibility of existing infrastructure (e.g. through undergrounding cables) with a focus on schemes supported by Western Power Distribution at Newport Parrog, Great Castle Head and Marloes Sands.
- d. Conserve and restore field boundaries and trees in the landscape, and create hedgerows and new woodland strips, taking into account landscape character, species' connectivity needs and the impacts of plant pathogens e.g. *Chalara* ash dieback, and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape.
- e. Collaborate in delivery of projects arising from the *Pembrokeshire Well-being Plan*, e.g. Meaningful Community Engagement.
- f. Compile an assessment of land management risks to earth heritage sites and prioritise for management.
- f.g. Manage littering and raise awareness of its impacts.

Comment [A3]: MP012

Policy L2: Protect and enhance dark night skies.

Impacts during the Plan period:

- a. Produce and promote supplementary planning guidance for Pembrokeshire on lighting for developments requiring lighting schemes (Pembrokeshire County Council and Pembrokeshire Coast National Park Authority).
- b. Engage with communities to reduce unwanted light.
- c. Promote good practice in regard to lighting, with enforcement where appropriate, focussing on installations intervisible with Dark Sky Discovery sites.

Comment [A4]: MP018

A national asset

Policy L3: Protect and enhance natural soundscapes.

Impacts during the Plan period:

- a. Collaborate through the Pembrokeshire Greenways Partnership to provide and promote accessible and affordable public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.
- b. Manage proposals for intensification of use or extension of Ministry of Defence sites in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policy.

Sustainability Appraisal summary (3rd iteration)

Policy L1: Strongly positive for sustainability appraisal objectives for landscapes/seascapes and biodiversity, particularly with regard to resilience. ~~No changes recommended.~~

Policy L2: Contributes positively to sustainability appraisal objectives for landscape and biodiversity, may also benefit sustainability appraisal objective regarding tourism outside of peak season. ~~No changes recommended.~~

Policy L3: Contributes positively to sustainability appraisal objectives, mainly through focussing on reducing the use of private vehicles in favour of alternative transport and active travel seeking to reducing reduce pollution and greenhouse gas emissions as well as noise. ~~No changes recommended.~~

3. Well-being, enjoyment and discovery

Policy W1: Provide and promote sustainable outdoor recreation opportunities for all.

Impacts during the Plan period:

- a. Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences, and promote it to new audiences ([Pembrokeshire Coast National Park Authority](#) and [Pembrokeshire County Council](#)).
- b. Implement the *Rights of Way Improvement Plan 2018-2028*, in partnership with communities, user groups and client groups.
- c. Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access* (2017).
- d. Collaborate in delivery of projects arising from the *Pembrokeshire Well-being Plan*, e.g. Celebrating the Great Outdoors.
- e. Improve water quality at designated bathing waters achieving less than “Excellent” status.
- f. Manage potential / actual recreational pressures¹¹ and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft¹².
- g. Collaborate through the Destination Pembrokeshire Partnership to manage Pembrokeshire and the National Park as a sustainable destination.
- h. Work collaboratively ~~with others~~ to ensure the promotion of the National Park as a destination reaches and is representative of more diverse audiences, including children and young families from deprived areas.
- i. Collaborate through the Pembrokeshire Greenways Partnership to provide and promote accessible and affordable public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.
- j. Promote more frequent local participation in activities including walking, cycling, rowing, paddle-boarding, canoeing, kayaking and swimming in locations where

Comment [A5]: MP019

Comment [A6]: MP034 (see footnote)

¹¹ Including those identified in *Enjoying the Pembrokeshire Coast National Park. A Plan to provide and manage opportunities for Sustainable Recreation in the National Park*.

¹² Sites include Abereiddi, Abermawr, Barafundle and Stackpole Quay, Cwm yr Eglwys, [Freshwater East](#), Freshwater West, Martin’s Haven, Porthgain, Pwllgwaelod, St Justinian, Strumble and Whitesands.

Landscapes for everyone

capacity exists.

- k. Collaborate to enable public access to water where appropriate for quiet enjoyment.
- l. Manage the Milford Haven Waterway in line with the *Milford Haven Waterway 5 Year Recreation Management Plan 2016*, and enforce Waterway, harbour, beach and byelaws.
- m. Collaborate in delivery of nature-based health services, including targeted walking programmes, mental health initiatives, and supporting people living with dementia.
- n. Deliver the Pembrokeshire Beach Strategy and prepare and deliver a Foreshore Management Plan.
- o. Manage recreational disturbance to species and species groups, such as cliff-nesting birds and marine mammals, through codes of conduct, restrictions and awareness-raising.

Policy W2: Provide and promote inspiring outdoor learning and personal development opportunities for all.

Impacts during the Plan period:

- a. Deliver active outdoor, environmental, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).
- b. Interpret and animate cultural heritage, natural history and the arts at owned and managed sites.
- c. Offer volunteering / citizen science and formal training opportunities.
- d. Develop seasonal astrotourism activities and events, subject to guidance and adequate mitigation of any impacts e.g. on wildlife and livestock.

Sustainability Appraisal summary (3rd iteration)

Policy W1: Promotes a holistic approach to managing recreational activities in the National Park. Aims to protect the recreational resource, the landscape/natural environment (including the marine environment), and manage the pressures that arise from activities such as unauthorised camping. It also aims to reduce congestion and greenhouse gas emissions associated with private car use throughout the National Park through collaboration with the Pembrokeshire Greenways Partnership. Overall the policy contributes positively across a range of the sustainability appraisal objectives. ~~No changes recommended.~~

Landscapes for everyone

Policy W2: Contributes very positively towards the sustainability appraisal objective on physical recreation and volunteering. Promotion of dark skies related tourism activities is likely to bring benefits to the visitor economy including some outside of the season. However, the promotion of these activities is also likely to result in some minor, infrequent seasonal impacts to biodiversity. The inclusion of the measures under part d) of the policy will help to mitigate this impact. ~~No changes recommended.~~

4. Protecting and restoring biodiversity

Policy E1: Protect and improve biodiversity quality, extent and connectivity at scale.

Impacts during the Plan period:

- a. Maintain and extend delivery of locally tailored agri-environment assistance (including advice, capital grants, management agreements, help with grazing, access to volunteers, conservation covenants) in support of biodiversity restoration (e.g. hay meadows, marshy grassland, hedges and stream corridors), including designated nature conservation sites and other high nature value sites.
- b. Conserve and restore semi-natural woodland, wood pasture, trees in the landscape and field boundaries, taking into account species' connectivity needs, landscape and the impacts of plant pathogens e.g. *Chalara* ash dieback, and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape.
- c. Manage and monitor invasive non-native and /or harmful species in partnership with local communities, with specific reference to Japanese knotweed, Himalayan balsam and *Rhododendron* in the Gwaun, Porthgain, Clydach and Castlemartin catchments.
- d. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policies and supplementary planning guidance on biodiversity.
- e. Support the Pembrokeshire Wildfire Group and relevant stakeholders to manage and mitigate wildfire risks.
- f. Contribute to delivery of the B-lines Network in Pembrokeshire, and to conservation and enhancement of the Bumblebee Conservation Trust priority sites.
- g. Manage lighting for vulnerable species and species groups including bats, otter, dormouse, Manx shearwater (vulnerable also to ships' lighting) and invertebrates.
- h. Implement the management schemes for Pembrokeshire Marine Special Area of Conservation, Carmarthen Bay and Estuaries European Marine Sites and Cardigan Bay Special Area of Conservation (priority actions include awareness-raising, sustainable management of living resources such as bait and seaweed, marine litter and marine invasive species monitoring), supporting management of neighbouring marine Special Protection Areas as appropriate and collaborating in delivery of Marine Protected Area Network Management Action Plans.
- i. Collaborate on marine pollution prevention, contingency planning and response.

Comment [A7]: MP012

A resilient Park

- j. Acquire or lease sites of actual or potential nature value where this is a cost-effective management option.
- k. Interpret and animate cultural heritage, natural history and the arts ~~at owned and managed sites.~~
- l. Promote locally-produced, environmentally sound and socially responsible food (e.g. organic standard, community-grown or conservation-grade produce).
- m. Manage recreational disturbance to species and species groups such as cliff-nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.
- n. Undertake particular measures to conserve species for which Pembrokeshire is uniquely important (e.g. Southern damselfly, a feature of the Preseli Special Area of Conservation).
- o. Support local delivery of the Welsh Government's proposed ~~Sustainable Farming Scheme~~ agriculture scheme.
- p. Collaborate in delivery of projects arising from the *Pembrokeshire Well-being Plan*, e.g. Environmental and Climate Change Risk Assessment.
- q. Resist proposals which have a likely significant ~~adverse~~ effect (either alone or in combination with other plans and projects) upon a European site unless it can be ascertained following an appropriate assessment that they will have no significant adverse effect on the integrity of the site(s) concerned.
- r. Monitor wildlife crime ~~and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.~~

Comment [A8]: MP021

Sustainability Appraisal summary (3rd iteration)

Policy E1: Policy contributes to the sustainability appraisal objective on biodiversity, with further positive implications for the landscape, climate change and the water environment. There are also benefits to the sustainability appraisal objective for the rural economy through the support of local produce and to the sustainability of the local visitor economy through maintaining and improving the state of wildlife. ~~No changes recommended.~~

5. Celebrating heritage

Policy H1: Conserve and enhance landscapes of particular historic interest, **Conservation Areas**, scheduled monuments, listed buildings and their settings.

Comment [A9]: MP023

Impacts during the Plan period:

- a. Raise public awareness and enjoyment of historic landscapes, buildings and monuments, increase appropriate access to them and engage and support communities and volunteers in heritage monitoring and conservation.
- b. Monitor the condition of scheduled monuments and sites of local **heritage** significance.
- c. Target management (including agri-environment scheme assistance) to stabilise monuments in worsening condition, prioritising according to monument condition and the nature of risk, with recording and rescue excavation, as appropriate, for sites at risk of coastal erosion.
- d. Conserve and restore field boundaries with a particular emphasis on areas of registered historic landscapes and relevance to connectivity for biodiversity.
- e. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* heritage policies and associated guidance (e.g. updates to conservation area proposals documents, including review of tree preservation orders).
- f. Conserve and enhance conservation areas and historic buildings, including listed buildings and buildings at risk, through advice, grants and enforcement.
- g. Conserve local distinctiveness in the built environment.
- h. Celebrate place names, e.g. field names.
- i. Monitor heritage crime and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.

Comment [A10]: MP024

Comment [A11]: MP025

Policy H2: Promote the Welsh language and local dialects. and celebrate culture and creativity related to the landscape.

Impacts during the Plan period:

- a. Interpret and animate landscape, cultural heritage, natural history and the arts ~~at owned and managed sites.~~

A place of culture

- b. Contribute to the target¹³ for the number of people able to enjoy speaking and using Welsh to reach a million by 2050.
- c. Collaborate with local communities and others to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park and provide opportunities for people to share stories about their relationship with the landscape and their own heritage.
- d. Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings.
- e. Collaborate in delivery of projects arising from the *Pembrokeshire Well-being Plan*, e.g. Community Participation.

Sustainability Appraisal summary (3rd iteration)

Policy H1: Policy directly addresses the aspirations of the sustainability appraisal objective for landscapes with wider benefits for biodiversity/ecological resilience to climate change, the visitor economy and maintaining the cultural diversity of the National Park. No changes recommended.

Policy H2: Policy contributes very positively to the sustainability appraisal objective on cultural diversity, particularly the Welsh language aspect of this objective. There are also wider benefits for biodiversity through increasing knowledge and awareness and by conserving the knowledge of the value of biodiversity that is already embedded in the communities of the National Park. In addition, celebrating culture brings benefits to the local visitor economy throughout the year via the economic impact of through the propagation of events. ~~No changes recommended.~~

¹³ *Cymraeg 2050*

6. Managing natural resources sustainably

Policy N1: Contribute to a low carbon economy for Wales¹⁴ and adapt to climate change.

Impacts during the Plan period:

- a. Collaborate in delivery of actions in *Prosperity for All: a Low Carbon Wales* including a carbon neutral public sector by 2030, implementing renewable energy and energy efficiency measures (see N1b), reducing transport emissions (see N1d) and safeguarding and increasing carbon storage (see N3b) including agricultural soils.
- b. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policies and guidance in relation to soil, water, air and earth heritage, support for appropriate renewable energy development and energy efficiency measures, flooding and coastal inundation, development in coastal change management areas, relocation of development affected by coastal change, sustainable design and drainage and waste, supported by supplementary planning guidance where needed, and promoting waste efficiency through the waste hierarchy and by raising awareness of circular economy principles.
- c. Collaborate in delivery of projects arising from the *Pembrokeshire Well-being Plan*, e.g. Becoming a Carbon-neutral County.
- d. Collaborate on coastal adaptation schemes e.g. Newgale.
- e. Collaborate through the Pembrokeshire Greenways Partnership to provide and promote accessible and affordable public transport, active travel and low-carbon vehicle initiatives.

Comment [A12]: MP026

Policy N2: Conserve and enhance water quality and restore water levels and natural flow regimes.

Impacts during the Plan period:

- a. Support monitoring and status improvement of those water bodies in the National Park classed as poor or moderate through Natural Resources Wales' relevant River Basin Management Plan programme of measures¹⁵, the regulations scheduled for 1st January 2020 (including volume reduction and best practice management of slurry, silage, fuel oil, and agricultural chemicals; clean and dirty

¹⁴ [Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks](#), Welsh Government, 2018

¹⁵ The programme of measures includes volume reduction and best practice management of slurry, silage, fuel oil, and agricultural chemicals; clean and dirty water separation; nutrient management planning; buffer strips and riparian fencing; cover crops and soil management in targeted catchments.

Global responsibility

~~water separation; nutrient management planning; buffer strips and riparian fencing; cover crops and soil management in targeted catchments)~~ and through complementary initiatives e.g. nutrient trading.

Comment [A13]: MP002

- b. Implement Flood Risk Management Plans 2015-2021 for Cleddau and Pembrokeshire Coastal Rivers, Teifi and North Ceredigion.

Policy N3: Conserve and enhance soils and natural carbon storage.

Impacts during the Plan period:

- a. Promote locally-produced, environmentally sound and socially responsible food (e.g. organic standard, community-grown or conservation-grade produce).
- b. Support soil conservation, management of peat soils, wetland protection, conservation and expansion of semi-natural habitats, trees in the landscape, ~~and~~ reduction of artificial inputs ~~and protect the best and most versatile agricultural land from development~~¹⁶.
- c. Conserve and restore semi-natural woodland, wood pasture, trees in the landscape and field boundaries, taking into account species' connectivity needs, landscape and the impacts of plant pathogens e.g. *Chalara* ash dieback, ~~and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape~~.
- d. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policies and guidance in relation to soil, water, air and earth heritage.

Comment [A14]: MP027

Comment [A15]: MP012

Policy N4: Protect air quality.

Impacts during the Plan period:

- a. ~~Support Natural Resources Wales and the agricultural sector to r~~Reduce or intercept reactive nitrogen emissions with an initial focus on potentially-affected nature conservation sites.
- b. Monitor and manage as necessary pollutants such as oxides of nitrogen, carbon monoxide and particulates.

Comment [A16]: MP002

Sustainability Appraisal summary (3rd iteration)

Policy N1: Policy generates minor benefits to most of the sustainability appraisal objectives through the promotion of the policy framework set out in the Local Development Plan 2. ~~No changes recommended.~~

¹⁶ Land of grades 1, 2 and 3a of the Agricultural Land Classification system (Planning Policy Wales provides detailed policy prescriptions to be applied).

Global responsibility

Policy N2: Positive impacts for inland and coastal water quality and associated biodiversity. ~~No changes recommended.~~

Policy N3: Likely strong sustainability benefits to the rural farming economy in line with the sustainability appraisal objective for economic viability. Supporting soil and habitat conservation will help to maintain and enhance the natural carbon sinks in the National Park as well as conserve and enhance biodiversity. ~~No changes recommended.~~

Policy N4: The policy contributes positively to the relevant sustainability appraisal objectives. Issues concerning other air pollutants (including greenhouse gases) are dealt with directly in policies L3, W1, E1 and N1. ~~No changes recommended.~~

7. Next steps

~~The National Park Authority welcomes your views on the proposals in this draft Management Plan. A questionnaire is provided.~~

~~Following the consultation, a revised Management Plan will be prepared for approval and subsequent adoption by the National Park Authority. A report of consultations will explain how consultation comments have been taken into account.~~

~~The National Park Authority will work with partners to implement and monitor the Management Plan. Partners will be encouraged to adopt the Plan and / or the impacts within it and to celebrate those contributions. An Action Plan which highlights annual campaigns or themes, for example by focusing on heritage, conservation, or responses to climate change, will be prepared. Specific discussions and work will continue, for example in regard to implementing equalities impact recommendations.~~

~~The intention is to maintain conversations and engagement throughout the Management Plan delivery period. An engagement action plan group has been established within the National Park Authority with this as a key task, reported on through the Authority's performance management framework.~~

~~If you would like to discuss any aspect of the Management Plan please contact:~~

~~Park Direction
Pembrokeshire Coast National Park Authority
Llanion Park
Llanion
Pembroke Dock
SA72 6DY~~

~~Phone: 01646 624800~~

~~Email: devplans@pembrokeshirecoast.org.uk~~

Annex A – Background to the National Park and the Management Plan

Priorities based on evidence

- 1.1 A background paper (*The State of the National Park 2019*), available on the National Park Authority's website, has been compiled in preparation of this ~~draft~~ Management Plan. Some of the key evidence sources are listed at Annex C. The National Park Authority is highly dependent on partner organisations' monitoring programmes, including in particular those of Natural Resources Wales and Cadw.
- 1.2 The *State of the National Park 2019* is supplemented by an extensive environmental, social and economic baseline which forms part of the ~~consultation draft~~ Sustainability Appraisal (incorporating Strategic Environmental Assessment), ~~which provides context on the state of the National Park and informs the Management Plan review process.~~
- 1.3 The Pembrokeshire Public Service Board¹⁷ has published a local Well-being Plan, underpinned by *The Well-being Assessment for Pembrokeshire*, which was informed by extensive engagement and survey work with citizens and stakeholders, existing data, evidence and research. The Well-being Plan for Pembrokeshire was published in May 2018. It contains eight integrated projects, many of which have significant links to National Park purposes. An Equality Impact Assessment has also been prepared (see below).
- 1.4 "*Opportunities and Challenges: Discussion Paper for the National Park Management Plan 2020-2024*"¹⁸, and associated maps, were made available for comment from 20th November 2018 to 4th January 2019 as part of the early engagement programme for National Park Management Plan review. These, and a series of background papers¹⁹, were a product of informal ongoing conversations with partner organisations and the public.
- 1.5 This approach is in keeping with an iterative approach to planning, where the outputs and learning from one plan cycle inform the next. The National Park Authority would like to help partner organisations to consider how they may contribute to National Park purposes through their own work, and to celebrate those contributions, and a strategic partnership group was set up as part of the Management Plan review.

¹⁷ Pembrokeshire County Council; Hywel Dda University Health Board; Mid and West Wales Fire and Rescue Service; Natural Resources Wales; Dyfed-Powys Police; Police and Crime Commissioner; Pembrokeshire Coast National Park Authority; Pembrokeshire Association of Voluntary Services; Pembrokeshire College; Port of Milford Haven; Public Health Wales; PLANED; Job Centre Plus; National Probation Service; Welsh Government.

¹⁸ [Opportunities and Challenges: Discussion paper for the Management Plan 2020-2024](#)

¹⁹ Background Papers: (1) Landscape, seascape, tranquillity and dark skies; (2) Well-being, equality and livelihoods; (3) Outdoor recreation and learning; (4) Nature conservation; (5) Culture and heritage; (6) Climate and energy; (7) Natural resources; (8) Legislation and policy. These have been incorporated into *The State of the National Park 2019*.

The state of wildlife: a key challenge for 2020-2024

- 1.6 The state of wildlife in Pembrokeshire remains a major concern. In 2016, a representative range of habitats and species was assessed for condition and likely trend. Those assessed as in good condition and / or with improving trend had all been the subject of sustained conservation effort. The majority of habitats and species assessed were in poor or moderate condition and the overall trend is one of decline.
- 1.7 In 2018, the Campaign for National Parks published *Raising the Bar: improving nature in our National Parks*. The report assessed the approaches to biodiversity taken in National Park Management Plans and called for far bolder approaches to nature conservation and ecosystem restoration. A number of the conclusions and recommendations from that report are reflected in this Management Plan.
- 1.8 Most conservation effort is scalable, but resources are needed to influence the management of more agriculturally-productive farmland. Agricultural support schemes need to reward the production of public goods and widen participation in ecological restoration across Wales. Welsh Government's proposed Sustainable Farming Scheme ~~agriculture scheme~~ will be critical to this, and would potentially contribute to impacts specified in this Management Plan as well as providing a potential new income stream to land managers ~~after if~~ Britain's exits from the European Union.

A partnership approach

- 1.9 The National Park Authority will not achieve National Park purposes on its own and works closely with many other organisations and individuals. Some organisations have a legal duty to have regard to the purposes²⁰, but in practice the National Park Authority and partners work collaboratively to plan for and achieve shared and complementary goals²¹.
- 1.10 The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016 add further statutory backing to National Park purposes and the need for participation and collaboration to achieve them. However there is a two-way relationship, with National Park management able to contribute significantly to the aims of the legislation.
- 1.11 The themes in this Management Plan ~~themes~~ are intended to reflect this complementarity, to demonstrate the alignment of National Park policy with Wales' well-being, climate, natural resource and ecosystem resilience goals.
- 1.12 The South-West Area Statement and Marine Area Statement, deriving from the Environment (Wales) Act 2016 and prepared by Natural Resources Wales, will provide a regional context for management.

²⁰ Environment Act 1995, section 62. The Sandford principle also applies to these organisations.

²¹ The National Park Authority's annual Corporate and Resources Plans set out annual actions and targets for the National Park Authority.

Management Plan guidance

- 1.13 Guidance on preparing National Park Management Plans in Wales was published by the Countryside Council for Wales in 2007 and was supplemented with advice issued by Natural Resources Wales in 2014 on incorporating ecosystem conservation into protected landscape management.
- 1.14 Ecosystem management principles include the recognition that change is inevitable, and that everyone should be involved in decision-making. The advice includes case studies and the key messages which can be taken from them. These and the principles of the Convention on Biological Diversity have been taken into account in reviewing the Management Plan.
- 1.15 ~~Natural Resources Wales is currently preparing updated guidance. An update for protected landscapes provided by Natural Resources Wales in May 2018 recognises protected landscape management plans as being at the heart of nature-based and place-based solutions, with strong contributions to make to resilience and natural resource management objectives at wider scales.~~

Valued and Resilient

- 1.16 *Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks* was issued by Welsh Government in July 2018. It replaces the previous (2007) policy statement and outlines key priority areas for national parks and national park authorities in Wales. These include:
- providing meaningful opportunities to participate in the preparation of plans and decision-making
 - helping to tackle the inequalities that exist in health, education and economic outcomes amongst the poorest in society
 - exemplifying approaches to reconciling tensions around competing demands for natural resources
 - pursuing the sustainable management of natural resources in the exercise of National Park Authority functions
 - securing healthy, resilient and productive ecosystems that are managed sustainably and contribute to connectivity between habitats
 - increasing woodland cover while respecting the special qualities of these landscapes
 - enabling the generation of renewable energy at an appropriate scale, water management and carbon sequestration
 - facilitating appropriate development while maintaining the integrity of landscape quality
 - developing and refining national park authorities' understanding of local economic resilience and economic opportunities
 - encouraging, providing for and managing responsible outdoor recreation opportunities
 - increasing public awareness of the value of the Welsh language.

The five ways of working

- 1.17 The National Park Authority and many of its partners are bound by the five ways of working, set out in the Well-being of Future Generations (Wales) Act 2015²². The intention is that the Management Plan (a plan which gives rise to projects) will fulfil the five ways of working as follows. These are regarded as [areas for continuous improvement](#)~~works-in-progress~~.

Long term	The Plan adopts the principles of sustainable natural resource management.
Prevention	The Plan proposes ways to avoid and design out issues as well as ways of addressing them.
Integration	The Plan aligns with local and national well-being objectives and goals, with <i>Natural Resources Policy</i> priorities ²³ and with Area Statements.
Collaboration and Involvement	If the Management Plan process is to add value it should facilitate collaboration between partners and involve a representative cross-section of society. Plan review and implementation provides a continuous opportunity to start new conversations and forge and maintain new relationships. The Equality Impact Assessment of the Management Plan has identified further potential for collaboration.

Sustainable management of natural resources

- 1.18 Principles for the sustainable management of natural resources are set out in the Environment (Wales) Act 2016 and are: (a) manage adaptively, (b) consider the appropriate spatial scale for action, (c) promote and engage in collaboration and co-operation, (d) arrange for public participation in decision-making, (e) take account of relevant evidence and gather evidence in respect of uncertainties, (f) recognise the benefits and intrinsic value of natural resources and ecosystems, (g) take account of the short, medium and long term consequences of actions, (h) prevent significant damage to ecosystems, (i) take account of the resilience of ecosystems, in particular the diversity, connectivity, scale, condition (including structure and functioning) and adaptability of ecosystems.

Equality

- 1.19 The National Park Authority's Strategic Equality Plan, 2016-2020 sets out the National Park Authority's equality objectives and the actions it will carry out to meet them. The Plan was informed by the Equality and Human Rights Commission's 2015 publication *Is Wales Fairer? The State of Equality and Human Rights 2015* (Equality and Human Rights Commission) and a multi-agency consultation and survey involving most public bodies in south and west Wales. [The National Park Authority's Strategic Equality Plan will be](#)

²² Section 5 of the Act (the sustainable development principle). *Guidance on using the Future Generations Framework for Projects* has been published by the Office of the Future Generations Commissioner for Wales.

updated within the Management Plan period to reflect the 2018 update to *Is Wales Fairer?*

1.20 Objectives are:

- To continue removing barriers that can be identified for people accessing National Park Authority services.
- To promote greater levels of participation from communities and other stakeholders in the decision-making of the National Park Authority.
- To develop a level of understanding of equality, fairness and justice issues among staff and members as befits a Welsh public sector organisation.
- To promote equality and diversity within the National Park Authority workforce.

1.21 These objectives and associated actions have been considered in preparing this ~~draft Management Plan, via the Equality Impact Assessment of the draft Management Plan, in terms of the equality objectives themselves and their application to National Park purposes, and in terms of the contribution that can be made through taking equality considerations into account when looking at achieving the other objectives.~~ The Strategic Equality Plan will be updated within the Management Plan period to reflect the 2018 update to *Is Wales Fairer?*

1.22 Policy areas with distinct equality aspects include planning policy, promotion, health and wellbeing initiatives, volunteering opportunities, access to rights of way, skills development and visitor experiences and participation. The Equality Impact Assessment identifies a number of considerations to be taken into account in any project or scheme design in support of the Management Plan and National Park purposes, ~~and a range of questions for consultation.~~

Annex B – Related plans, policies and guidance

A landscape for life and livelihoods

- Landscape Character Assessment, National Park Authority
- [Marine Area Statement \(in preparation\)](#), Natural Resources Wales
- Marine Character Areas Wales, Natural Resources Wales
- National Landscape Character Areas, Natural Resources Wales
- Seascape Character Assessment, National Park Authority
- [South-West Wales Area Statement \(in preparation\)](#), Natural Resources Wales
- [Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks](#), Welsh Government, 2018
- [Valuing Wales' National Parks 2013](#), National Park Authority
- [Wales National Marine Plan 2019](#), Welsh Government

Well-being, enjoyment and discovery

- [Enjoying the Pembrokeshire Coast National Park. A Plan to provide and manage opportunities for Sustainable Recreation in the National Park](#), National Park Authority, 2011
- [Is Wales Fairer? The State of Equality and Human Rights 2015](#), Equality and Human Rights Commission, 2015
- [Is Wales Fairer? The State of Equality and Human Rights 2018](#), Equality and Human Rights Commission, 2018
- [Milford Haven Waterway 5 Year Recreation Management Plan 2016](#), Port of Milford Haven
- [Recreational Audit for Disabled Access in Pembrokeshire: Potential Solutions to Barriers Report](#), 2017
- [Rights of Way Improvement Plan for Pembrokeshire 2018-2028](#), Pembrokeshire County Council and Pembrokeshire Coast National Park Authority
- [STEAM Tourism Impacts, Pembrokeshire Coast National Park 2017](#), Global Tourism Solutions (UK) Ltd
- [Well-being Plan for Pembrokeshire 2018](#), Public Services Board

Protecting and restoring biodiversity

- [Action Plan for Pollinators Wales \(Review 2013-18 and Future Actions\)](#), Welsh Government
- [B-lines: network resources](#), Buglife and partners
- [Cardigan Bay Special Area of Conservation Management Scheme](#), 2008
- [Carmarthen Bay and Estuaries European Marine Site Management Scheme](#), 2013
- [Invasive Non-Native Species action plan](#), Pembrokeshire Nature Partnership
- Local Network connectivity data, West Wales Biodiversity Centre
- [Marine Area Statement](#), Natural Resources Wales
- [Marine Protected Area Network Management Action Plan for Wales](#), Welsh Government
- [Nature Recovery Action Plan for Pembrokeshire](#), 2018, Pembrokeshire Nature Partnership
- [Nature Recovery Plan for Wales](#), 2015

- [Pembrokeshire Marine Special Area of Conservation Management Scheme](#), 2008
- [Raising the bar: improving nature in our National Parks](#), Campaign for National Parks, 2018
- [South-West Area Statement](#), Natural Resources Wales
- [Vital nature: Making the connections between biodiversity and the people and places of Wales](#), Natural Resources Wales, 2018

Celebrating heritage

- [Caring for Historic Landscapes](#), Cadw, Welsh Government, Countryside Council for Wales, Welsh Archaeological Trusts, 2007
- Register of Landscapes of Outstanding Historic Interest in Wales, Cadw, the International Council on Monuments and Sites and Natural Resources Wales
- Register of Landscapes of Special Historic Interest in Wales, Cadw, the International Council on Monuments and Sites and Natural Resources Wales
- Register of Parks and Gardens of Special Historic Interest in Wales, Cadw

Managing natural resources sustainably

- ~~[Achieving our low carbon pathway to 2030 \(consultation draft\)](#), 2018, Welsh Government~~
- [Assessing and Addressing Atmospheric Nitrogen Impacts on Natura 2000 Sites in Wales](#), NERC Centre for Ecology and Hydrology, 2015
- [Cleddau and Pembrokeshire Coastal Rivers Abstraction Licensing Strategy](#), 2014, Natural Resources Wales
- [Coastal Change Management Areas methodology](#) and Coastal Change Management Area maps (*Local Development Plan 2*), National Park Authority
- [Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan](#) (update), National Park Authority
- [Water Resources Management Plan 2019](#), Dŵr Cymru / Welsh Water
- [Global Warming of 1.5°C](#), Intergovernmental Panel on Climate Change, 2018
- [Introducing Sustainable Management of Natural Resources](#), Natural Resources Wales
- [Marine Area Statement \(in preparation\)](#), Natural Resources Wales
- [Natural Resources Policy](#), Welsh Government, 2017
- [Newgale Adaptation Plan](#), Pembrokeshire County Council, April 2015
- [Prosperity for All: A Low Carbon Wales](#), Welsh Government, 2019
- [South Wales Shoreline Management Plan 2](#), finalised 2014
- [South-West Area Statement \(in preparation\)](#), Natural Resources Wales
- [Teifi and North Ceredigion Abstraction Licensing Strategy](#), 2014, Natural Resources Wales
- [UK Climate Change Risk Assessment 2017 Evidence Report Summary for Wales](#), 2017, Committee on Climate Change
- [We need to talk about nitrogen. The impact of atmospheric nitrogen deposition on the UK's wild flora and fungi](#), Plantlife and Plant Link UK, 2017
- [West of Wales Shoreline Management Plan 2](#), finalised 2014
- [Western Wales River Basin Management Plan 2015-2021](#), Natural Resources Wales

Annex C - Key evidence sources

A landscape for life and livelihoods

- [Demographic Forecasts](#), National Park Authority, 2018
- Geological Conservation Review site data, Natural Resources Wales
- LANDMAP, Natural Resources Wales
- Regionally Important Geological site data
- Visible Infrared Imaging Radiometer Suite data, National Aeronautics and Space Administration - National Oceanic and Atmospheric Administration

Well-being, enjoyment and discovery

- [Bathing Water Quality assessment](#), Natural Resources Wales
- *Country Path User Survey 2015-16*, Pembrokeshire Coast National Park Authority
- [National Survey for Wales 2016 -2017. Key Facts for Policy and Practice. Outdoor Recreation](#), Natural Resources Wales
- [Well-being Assessment for Pembrokeshire 2017](#), Public Services Board

Protecting and restoring biodiversity

- Extents of habitat relative to threshold patch size for: coastal slopes mosaic; woodland; unimproved grassland and cloddiau; inland heaths. National Park Authority – to be developed.
- Natural Resources Wales datasets: Priority Habitat Connectivity; Floodplain Reconnection Potential; Floodplain Woodland Planting Potential; Riparian Woodland Potential; Wider Catchment Woodland Potential.
- Phase 1 survey (hybrid original and remote sensed 2014), Natural Resources Wales
- [State of Natural Resources Report 2016](#), Natural Resources Wales
- [State of Wildlife in Pembrokeshire \(2016 update\)](#), Pembrokeshire Nature Partnership
- [Status of European designated sites](#) (including 2018 indicative feature condition assessments), Natural Resources Wales

Celebrating heritage

- Conservation Area data, National Park Authority
- Historic Environment Record, Dyfed Archaeological Trust
- Listed Buildings data, Cadw
- [Maritime Assets spatial dataset](#), Royal Commission for the Ancient and Historical Monuments of Wales
- Percentage and trends in Welsh speakers, Office for National Statistics (2011 Census)
- [National Survey for Wales, 2013-14: Welsh Language Use Survey](#), Statistics for Wales, Welsh Language Commissioner, Welsh Government
- Scheduled Monuments data, Cadw

Managing natural resources sustainably

- [Air pollution emissions data](#), National Atmospheric Emissions Inventory
- [Soilscapes data](#), developed by Cranfield University and sponsored by the Department for Food, Environment and Rural Affairs
- [State of Natural Resources Report 2016](#), Natural Resources Wales

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY
Equality Impact Assessment – consultation draft**



Decision/Policy (brief outline):	National Park Management Plan (Review) 2020 -2024 Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995).
Lead Officer	M Thomas / M Regelous
Date:	For consultation: 1st August 2019 – 31st October 2019 <i>[Amended to take account of Consultation Responses and feedback from Regional Public Bodies Equality Plan Surveys and Stakeholder events]</i>

Note:

Due to the nature of the National Park Management Plan it has been identified that a full Equality Impact Assessment was needed and as a result a screening exercise was not undertaken. This Equality Impact Assessment will be reviewed at different stages of the drafting of the Plan.

Description of the policy/decision/proposal

1. Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995). This plan sets out National Park policy for the Authority and for other agencies and organisations whose activities might impact on the Park.
2. The Management Plan also provides a context for planning and managing the built environment. Development planning policies are set out in the current adopted Local Development Plan (September 2010) which will in due course be superseded by the replacement Pembrokeshire Coast Local Development Plan (to 2031) for the National Park.
3. The current National Park Management Plan covers the period 2015-2019. The replacement Management Plan will run from 2020-2024.
4. National Park residents, businesses and visitors have a major stake National Park management, and many other organisations and individuals are involved in delivering the purposes.
5. The Management Plan is being created with stakeholders, to provide a framework for:
 - a) conserving landscape, wildlife, cultural heritage and natural resources
 - b) enjoying and learning about the National Park
 - c) economic activity that complements or supports these

Context Setting

Equality Impact Assessment

6. The specific equality duties in Wales are set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. They place a duty on Pembrokeshire Coast National Park Authority to assess and consult on the impact its proposed policies will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and its ability to meet the public sector equality duty.
7. The requirement to assess impact means that the Authority must consider relevant evidence in order to understand the likely or actual effect of policies and practices on protected groups.
8. This includes ensuring the policy or practice does not unlawfully discriminate, identifying any adverse impacts on protected groups, considering how the policy or practice could

better advance equality of opportunity and considering whether the policy will affect relations between different groups.

9. This process requires listed bodies to consider taking action to address any issues identified such as, addressing negative impacts, where possible. The Authority must have 'due regard' to the results of this process.¹
10. Equality Impact Assessments are a systematic way of meeting this duty. The Authority has an Equality Impact Assessment template proforma for assessments which has been used. This template and process has been modified due to the nature of the National Park Management Plan making process to include the following stages:

Context setting: Information on National Park Management Plan review process and wider policy framework it operates in.
Review of the evidence base: Consideration of quantitative and qualitative sources and their relevancy to the National Park Management Plan review to form basis for identifying impacts for the Assessment. This includes consideration of consultation information collected prior to drafting as part of work around the Opportunities and Challenges document.
Assessing potential Impact and action planning: Officers provided responses to impacts identified and sought further information or clarification where needed. A number of actions were identified during this process.
Equality Impact Summary Report: Produced for Members' Consideration
Formal Consultation National Park Management Plan: Questions on the Equality Impact Assessment will be included within the questionnaire. Equality organisations and community groups have been included within the list of consultees who will be contacted.
Monitoring and Review: The content of the Assessment will be reviewed following feedback gathered as part of the consultation. Amendments and further actions will be identified and applied where necessary.
Declaration: This will be signed following completion of above stages.

¹ EHRC, 4. Assessing Impact: A guide for listed Public Authorities in Wales: <http://bit.ly/2jqrMoo>

The National Park and its Special Qualities

11. Pembrokeshire Coast National Park was designated in 1952 under the National Park and Access to the Countryside Act 1949.

12. Pembrokeshire Coast National Park's "special qualities" are:

Accessibility	Coastal Splendour
Diverse Geology	Diversity of Landscape
Cultural Heritage	Islands
Rich historic environment	Space to breathe
Richness of habitats and biodiversity	Remoteness, tranquillity and wildness
Distinctive Settlement Character	The diversity of experiences and combination of individual qualities

13. The National Park covers an area of 612km², with approximately 23,000 people living in some 50 community council areas. Most of the National Park is in private ownership with the Authority owning only about 1%.

A Partnership Approach and the Well-being Future Generations Act

14. The National Park Authority will not achieve National Park purposes on its own and works closely with many other organisations and individuals. Some organisations have a legal duty to have regard to the purposes, but in practice the National Park Authority and partners work collaboratively to plan for and achieve shared and complementary goals.

15. The Plan will look at partnership action across five complementary themes. The themes directly relate to National Park purposes and the special qualities. The themes also align with the goals described in the Well-being of Future Generations (Wales) Act 2015. They are:

- a) A national asset (A landscape for life and livelihoods)
- b) Landscapes for everyone (Well-being, enjoyment and discovery)
- c) A resilient Park (Protecting and restoring biodiversity)
- d) A place of culture (Celebrating heritage)
- e) Global responsibility (Managing natural resources sustainably)

16. The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016 add further statutory backing to National Park purposes and the need for participation and collaboration to achieve them. However there is a two-way relationship, with National Park management able to contribute significantly to the aims of the legislation. The themes are intended to reflect this complementarity, to demonstrate the alignment of National Park policy with Wales' well-being, climate, natural resource and ecosystem resilience goals, and to help identify opportunities to add value between national and local policy areas.

17. The National Park Authority and many of its partners are bound by five ways of working. These are a key element of The Well-being of Future Generations (Wales) Act 2015.

The intention is that the Management Plan (a plan which gives rise to projects) will fulfil the five ways of working as follows.

Long Term	The Plan adopts a long term management approach vision to 2050 and the principles of sustainable natural resource management.
Preventative	The Plan proposes ways to avoid and design out issues – not just ways of addressing them.
Integration	The Plan aligns with local and national well-being objectives and goals, and with Area Statement and National Natural Resources Policy priorities.
Collaboration	To add value requires collaboration between partners. the Plan review process is an opportunity to start new conversations and forge new relationships.
Involvement	The engagement programme for the Plan is based on the National Principles of Public Engagement in Wales.

Engagement

18. An [opportunities and challenges discussion document](#) was produced for the review of the National Park Management Plan and circulated for comment during the latter part of 2018. Engagement activities have also been carried out with different groups and at community events to gain different perspectives to inform the development of the reviewed plan. Feedback from these engagement activities have been considered in this assessment.
19. Authority Member workshops were held to inform the development of the Plan, and feedback from these sessions have also been considered as part of this assessment.
20. Questions on the Equality Impact Assessment will be included within the formal consultation on the National Park Management Plan.
21. During the early part of 2019/20 a regional (Pembrokeshire, Carmarthenshire, Ceredigion, Powys) multi-agency led consultation (survey and stakeholder events) ~~is being were~~ held to inform the revision of public bodies equality objectives and strategic plans. This assessment ~~will be was~~ reviewed and updated following the feedback and analysis from the survey and events to see if there are any implications for the assessment and National Park Management Plan.

Sustainability Appraisal and Welsh Language

22. The duty of National Park Authorities to foster the economic and social well-being of National Park communities in pursuit of their purposes, suggests that it is appropriate to consider wider sustainability objectives in an assessment of the National Park Management Plan. Guidance on National Park Management Plan preparation published

by Natural Resources Wales (NRW) advises that the requirements of Sustainability Appraisal and Strategic Environmental Assessment can be met in a single appraisal.

23. The Sustainability Appraisal is a process that is integral to and informs the Plan making process. The Sustainability Appraisal of the National Park Management Plan incorporates a Strategic Environmental Assessment.

24. The Sustainability Appraisal framework contains a specific objective / assessment criterion for the Welsh Language. The Sustainability Appraisal process also requires that the cumulative effects of the policies and strategy of the Management Plan be examined.

Timetable

Milestone	By whom/when	Equality Impact Assessment
Draft preparation timetable, and methods of engagement	Leadership Team, external bodies. May 2018	
Approve timetable and engagement proposals	National Park Authority. June 2018	
Engage with key stakeholders: <ul style="list-style-type: none"> • Collate evidence (outcomes, issues, policy impact) • Draft / revise Plan and associated assessments (see "Requirements for impact assessments" below) • Prepare an action planning framework 	July to December 2018	
Member Workshops to discuss draft reports and assessments	Spring 2019	Review of Baseline Data. Identification of if specific engagement with groups needed on areas identified.
Authority approval of consultation draft documents (Management Plan, Sustainability Appraisal / Strategic Environmental	National Park Authority June 2019	EQIA amended to reflect changes to NPMP following Members' amendments to document.

Milestone	By whom/when	Equality Impact Assessment
Assessment, Habitats Regulations Assessment, Equality Impact Assessment)		
Translation and formatting	June/July 2019	
Public consultation (12 weeks)	Park Direction Team August 2019 - October 2019	Include question on Equality Impact Assessment as part of formal consultation. Review Equality Impact Assessment in light of feedback from specific question on EQIA and broader consultation responses. Review assessment against feedback from regional consultation events and survey in terms of revision of public bodies' equality objectives and plans.
Report of consultations to Authority. Authority approval of amended documents.	National Park Authority December 2019	
Translation and formatting	Park Direction/Graphics Team December 2019/ January 2020	
Feedback to consultees	December 2019	
Publication of approved Management Plan and assessments; formal notification / adoption statements.	January 2020	

Potential impacts of the Plan

1. Customers, stakeholders and the public in general

- a) The Plan will influence future action that could affect people living in the Park in areas such as accommodation, employment, transport, access to the outdoors, heritage and culture, education, well-being initiatives and quality of the environment and landscape they live in. It could also impact on future resilience of communities within the Park area.
- b) The Plan will influence actions that could affect future visitors to the Park including access and experience.
- c) The Plan aims to increase access to the Park to non-traditional and underrepresented audiences and groups.
- d) The Plan aims to engage people in looking after the Park and influence behaviours of people when in the Park including recreational users.
- e) Plan is part of developing an ongoing conversation about the Park with Communities and Stakeholders.

2. The work undertaken by NPA and other organisations involved in the delivery of the plan

- a) The Plan will look at partnership impact across five complementary themes that the NPA and partner organisations will look to address and could affect work they carry out across these themes areas:
 - a. A national asset (A landscape for life and livelihoods)
 - b. Landscapes for everyone (Well-being, enjoyment and discovery)
 - c. A resilient Park (Protecting and restoring biodiversity)
 - d. A place of culture (Celebrating heritage)
 - e. Global responsibility (Managing natural resources sustainably)
- b) For the Authority it is likely to influence its Well-being Objectives and work streams and actions under them.

3. The long-term work of the NPA and other organisations involved in the delivery of the plan

- a) The Plan adopts the principles of sustainable natural resource management that this will influence the long term work of the Authority.
- b) Outcome and impact measures will be used to evaluate the direction and rate of travel. Where as part of this gaps are identified additional action may be required.
- c) The land use planning dimension of the National Park Management Plan is put into effect through the statutory Local Development Plan for the National Park.

4. Staff of NPA and other organisations involved in the delivery of the plan

- a) To solve some of the challenges identified or pursue some of the opportunities identified staff may need to change and adapt their ways of working. Staff may also be working within a context of increasing budget pressures and competing delivery pressures.
- b) Working collaboratively with partners will be key to delivery of the plan.
- c) Plan could impact on areas relating to workforce skills, transport, housing, recreation and access to the outdoors and culture all areas that could impact on workforce recruitment, experiences and retention.

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Overview of Issues for Consideration Identified

Issues for consideration: Review of Evidence and Engagement and Consultation Feedback Documents

25. Documents identifying issues for consideration have been created for each of the protected characteristics through reviewing evidence base and engagement and consultation feedback and responses. These documents and issues will be amended and reviewed following different stages of the Plan process and engagement activities:

- a) Age – Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- b) Disability – Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- c) Gender Reassignment – Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- d) Marriage and Civil Partnerships - Issues for considerations: Review of Evidence and Engagement and Consultation Feedback
- e) Pregnancy and Maternity - Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- f) Race - Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- g) Religion and Belief - Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- h) Sex - Issues for consideration: Review of Evidence and Engagement and Consultation Feedback
- i) Sexual Orientation - Issues for consideration: Review of Evidence and Engagement and Consultation Feedback

Consultation and Engagement Activities Undertaken to Date

Consultation Form and Survey – Opportunities and Challenges Document	
Scolton Manor Playday	1 st August 2018
Ateb Big Day Out	17 th August 2018
Travelling Ahead Gypsy Forum	17 th October 2018
Solva Care	27 th November 2018
Youth Rangers	2 nd December 2018

Representations on the Consultation draft Equality Impact Assessment

<u>Ref.</u>	<u>Respondent</u>	<u>Representation on the draft Equality Impact Assessment</u>	<u>Officer comments and recommendations</u>
EqIA001	Dyfed Archaeological Trust	<p><u>5(a) Do you agree with the Equality Impact Assessment of the draft Management Plan?</u></p> <p><u>Yes</u></p>	<p><u>Noted.</u> <u>No change to the draft Equality Impact Assessment is recommended.</u></p>
EqIA002	Dyfed Archaeological Trust	<p><u>5(b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment?</u> <i><u>(Please see the “Actions and Implementation” tables at the end of the Equality Impact Assessment for a summary of these.)</u></i></p> <p><u>Opportunities for less mobile members of a community to engage with the historic environment/cultural heritage. One way of achieving this could be travelling ‘road shows’ bringing teaching</u></p>	<p><u>Noted.</u> <u>Amend and Update Equality Impact Assessment:</u> <u>Comments included in Equality Impact Assessment under H1 and to be actioned through Project level response in terms of H1a, WC1 and WM1.</u></p>

<u>Ref.</u>	<u>Respondent</u>	<u>Representation on the draft Equality Impact Assessment</u>	<u>Officer comments and recommendations</u>
		<u>collections to adults with dementia of mobility issues. Engaging all members of communities promoting inclusivity and the historic environment.</u>	
<u>EqlA003</u>	<u>Dyfed Archaeological Trust</u>	<u>Many opportunities for supporting policies on religion and belief as many historic monuments are 'sacred' in nature. A more 'open door' approach providing access to certain sites at certain times.</u>	<u>Noted.</u> <u>Amend and Update Equality Impact Assessment:</u> <u>Comments included in Equality Impact Assessment under H2 and to be actioned through Project level response to H2d.</u>
<u>EIA004</u>	<u>Dyfed Archaeological Trust</u>	<u>Heritage trails/walks with children exploring historic landscapes. Generally speaking seeking out opportunities for community led excavations. Specifically to address the issue of promoting physical activity for girls - Land army days working on a farm?</u>	<u>Noted.</u> <u>Amend and Update Equality Impact Assessment:</u> <u>Comments included in Equality Impact Assessment under W2 and to be actioned through Project level response to W2a.</u>

<u>Ref.</u>	<u>Respondent</u>	<u>Representation on the draft Equality Impact Assessment</u>	<u>Officer comments and recommendations</u>
<u>EqIA005</u>	<u>Pembrokeshire County Council</u>	<p><u>6. (a) Do you agree with the Equality Impact Assessment of the draft Management Plan?</u></p> <p><u>Yes. This is a very thorough and detailed assessment that shows how consideration of equalities issues has influence how the Management Plan has developed.</u></p>	<p><u>Noted with thanks. No change to the draft Equality impact Assessment is recommended.</u></p>
<u>EqIA006</u>	<u>Pembrokeshire County Council</u>	<p><u>5 (b) Can you provide detail in relation to specific questions asked in the Equality Impact Assessment?</u></p> <p><u>We welcome the opportunity for further dialogue and note that we are already working in partnership with PCNPA and other organisations on the development of new Strategic Equality Plans.</u></p>	<p><u>Noted with thanks.</u></p>

Data Gaps

26. There are data gaps at a local level in terms of Sexual Orientation and Gender Identity, however this relates to wider national gaps in data.

27. Pembrokeshire Housing Market Assessment does not provide information on accessible housing or older persons accommodation need within the area.

28. The Multi-agency consultation/ survey and stakeholder events for regional bodies equality impact assessment including regional stakeholder events in relation Pembrokeshire ~~were~~ is due to be carried out after the draft assessment had been carried out. Information from the survey and regional stakeholder events will be used to inform the Authority's and other public bodies' review of their equality plans and objectives. The Equality Impact Assessment has now been reviewed against information from these engagement activities. ~~this information will be used to review the equality impact assessment and will inform the Authority's and other public bodies' approaches in relation to their strategic equality plans.~~

29. The review found that no changes were needed as the equality impact assessment had identified and addressed areas and themes identified through the consultation exercise. Please see Appendix 1 for further information on the feedback relevant for this assessment.

Assessing Impact against the General Duty: Introduction

Through the following tables the assessment will consider and assess the draft National Park Management Plan against:

- a) How could, or does, the plan help advance / promote equality of opportunity?
- b) How could / does the plan help to eliminate unlawful discrimination, harassment or victimisation?
- c) How could / does the plan impact on advancing / promoting good relations and wider community cohesion?
- d) What practical changes / actions could help reduce or remove any negative impacts?
- e) Provide justification if no action is to be taken.

Area for Consideration and Impact	+/-	Response / Mitigation
<p>Authority's Equality Plan is based on older version of EHRC <i>Is Wales Fairer</i>. Updated 2018 issue is available.</p> <p>When referencing equality plan and EHRC <i>Is Wales Fairer</i> there is a need to reference the more up to date version of the document and advise that the Authority will be revising its equality plan in 2019/20.</p>	-	<p>Action/ Amendment: Edit to be made to relevant Appendix in the Management Plan to refer to revision of Equality Plan and updated version of <i>Is Wales Fairer</i> 2019.</p> <p>Note: Addition made to Management Plan Annex A paragraph 1.21: "The Strategic Equality Plan will be updated within the Management Plan period to reflect the 2018 update to <i>Is Wales Fairer</i>?"</p>
<p>During the early part of 2019/20 a regional (Pembrokeshire, Carmarthenshire, Ceredigion, Powys) multi agency led consultation (survey and stakeholder events) is being held to inform the revision of public bodies equality objectives and strategic plans.</p>	+	<p>Response: This assessment will be reviewed and updated following the feedback and analysis from the survey and events to see if there are any</p>

The feedback and outcomes of these consultation exercises can be used to inform the development of the plan.

When referencing the Equality Plan and Objectives it is important that this recognizes that new plan will be developed in 2019/20 and there is an opportunity to align certain aspects of equality plan and NPMP to ensure an integrated approach to addressing issues.

implications for the assessment and National Park Management Plan where feasible with the respective timetables.

Action - Engagement:
Review draft Management Plan following feedback and analysis from regional multi agency equality surveys and engagement events.

[Note: EIA has been reviewed following feedback from regional multi agency equality surveys and engagement events. The review found that no changes were needed as the equality impact assessment had identified and addressed areas and themes identified through the consultation exercise. Please see Appendix 1 for further information on the feedback relevant for this assessment.](#)

A Landscape for Life and Livelihoods

L1: Conserve and enhance National Park landscapes and seascapes.*

- a. [Engage on an ongoing basis with a wide range of people about management of the National Park to achieve National Park purposes.](#)
- a-b. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policy, regarding ~~in particular~~ major development, defence sites, lighting, amenity, employment, housing allocations, housing windfall sites and exceptional land releases for affordable housing to promote sustainable communities, in particular.
- b-c. Reduce the visibility of existing infrastructure (e.g. through undergrounding cables) with a focus on schemes supported by Western Power Distribution at Newport Parrog, Great Castle Head and Marloes Sands.
- d. Conserve and restore field boundaries and trees in the landscape, and create hedgerows and new woodland strips, taking into account landscape character, species' connectivity needs and the impacts of plant pathogens e.g. *Chalara* ash dieback, [and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape](#).
- e. [Collaborate in delivery of projects arising from the Pembrokeshire Well-being Plan, e.g. Meaningful Community Engagement.](#)
- f. Compile an assessment of land management risks to earth heritage sites and prioritise for management.
- e-g. [Manage littering and raise awareness of its impacts.](#)

Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
<p>Age/ Disability/ Pregnancy and Maternity/ Sex:</p> <p>An ageing population, with a high concentration of older people in some Lower Layer Super Output Area (LSOAs) within the Park. In some LSOAs in the Park over quarter of the populations day to day activities are limited. An expected increase in the future of the number of people with Dementia in Pembrokeshire.</p> <p>A current and future demand for neighbourhoods and communities that facilitate ageing in place and promote prevention agenda through provision of accessible accommodation and support, accessible neighbourhood design and layout, access to health, community, toilet and other facilities and accessible transport. Provision of accessible neighbourhood layouts (such as drop curbs, benches for resting) alongside provision of baby changing facilities and parent and child</p>	+/-	<p>Response Land Use Planning:</p> <p>The extent to which land use planning can address many of these issues has been considered in detail by the Authority's review of its Local Development Plan – please see the Equalities Impact Assessment for the Local Development Plan 2.</p> <p style="background-color: #ffff00;">Action/ Amendment: No further action or amendment needed.</p> <p>Response – Project Level: There is</p>

<p>parking can also benefit expectant mums and new parents.</p> <p>Inaccessible neighbourhoods with poor facilities will impact on the ability of some people to participate in active travel in the Park.</p> <p>The above also needs to be seen in the context of changes to delivery of services with closure of many localised services including banks and move to digital delivery.</p> <p>What role can land use policy in the Park play in facilitating the following:</p> <ul style="list-style-type: none"> • Ageing in Place • Lifetime Homes/ care and support • Accessible and Life Time and Dementia Friendly Neighbourhoods, linked to layout and design • Access to facilities – including accessible toilets and changing facilities • Accessible Transport networks and associated infrastructure (e.g. bus stops) and accessible active travel routes (e.g. location of drop curbs) <p>Are there actions outside land use policy that could positively impact on the promotion of accessible and age/ dementia friendly neighbourhoods?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>potential to address some of these issues at project level through the following impact areas identified in W1: Impact Area k – Collaborate in delivery of nature-based health services, including targeted walking programmes, and supporting people living with dementia. Impact area c - Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access</i> (2017).</p> <p>Project Level Action: Addressing issues relating to age and dementia friendly neighbourhoods through development of projects. W1: c and k.</p>
<p>Age/ Marriage and Civil Partnerships</p> <p>Barriers to access to affordable housing options for young people and young families in the Park area.</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/- Response Land Use Planning: The Local Development Plan 1 and 2 strategies seek to increase the supply of affordable housing.</p> <p>Sustainable housing design is controlled through building regulations – see more</p>

Increased % of children in low income household within National Park Area may impact on need for affordable housing for families in the future. This also needs to be seen in the context of the introduction of Universal Credit for new claimants in Pembrokeshire in 2018.

House prices and rents in the National Park are significantly higher than the rest of Pembrokeshire, median sale price for houses in the National Park in 2017 was nine times the median wage. This makes access to appropriate housing difficult for new households forming in the National Park, or existing households whose current accommodation is no longer suitable.

Impact of second homes on housing affordability.

Provision of affordable housing can align with other impacts such as those relating to reducing CO2 and sustainable management of natural resources. Housing design and build can help individuals through reducing running costs of properties and support local supply chains as seen in some of the projects being funded under the Welsh Government's Innovative Housing programme.

A need to increase supply of affordable housing.

It is positive that explicit reference to exceptional land release for affordable housing is referenced in impact section.

Are there other mechanisms beyond land use policy that could assist in this area, for example development of schemes in the Park similar to those developed under the Welsh Government Innovative housing programme (that could also reduce fuel poverty and contribute to wider CO2 reductions) or initiatives relating

detailed response in the Equalities Impact Assessment for the Local Development Plan 2. In some instances developers seek to achieve a higher standard which is always welcomed.

Response outside land use planning: Issues around second homes are complex with both positive and negative concerns arising often in policy areas beyond the National Park. The Authority has resolved to discuss/debate this further recently. Any response is likely to require a partnership which would be much wider than would be covered by the Management Plan's remit. Similarly an Innovative Housing Programme would be wider than the National Park/Authority and from experience both are likely to need to be of national debate status.

Action/ Amendment: No further action or amendment needed.

<p>to second homes?</p>		
<p>Age / Disability/ Marriage and Civil Partnerships/ Sex:</p> <p>The need to help support and develop community focal points/ facilities, hubs (that are accessible), locations for events and activities that help address social isolation and provide opportunities for people to engage with others in the Park area.</p> <p>What role will land use policy in the Park play in supporting provision of community facilities and focal points?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+</p>	<p>Response Land Use Planning: The Equalities Impact Assessment for the Local Development Plan 2 provides commentary on this issue. There is a positive framework for community facility provision in the Local Development Plan.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Age / Disability</p> <p>How will land use policy contribute to facilitating sustainable employment opportunities?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/-</p>	<p>Response Land Use Planning: The Equalities Impact Assessment for Local Development Plan 2 addresses this issue. The Plan provides positive support for employment opportunities.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Race</p> <p>How will the Authority ensure that land use policy in the Park meets the needs of and doesn't discriminate against Gypsy and Travellers in terms of site provision?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/-</p>	<p>Response Land Use Planning: This issue has been addressed through the preparation of the Local Development Plan 2. Please see the Equalities Impact Assessment for detailed commentary.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Age / Disability</p>	<p>+/-</p>	<p>Response Land Use Planning: This</p>

<p>How will land use policy prevent developments in the Park having negative impact on public health (e.g. reducing access to green space, noise, air and other pollution? Etc.)</p>		<p>issue has been addressed through the preparation of the Local Development Plan 2. Please see the Equalities Impact Assessment for detailed commentary.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Age/ Disability/ Gender Reassignment / Pregnancy and Maternity / Race/ Religion or Belief/ Sex / Sexual Orientation</p> <p>Across the protected characteristics there are issues relating to people being targeted for harassment, sexual violence, domestic abuse and hate crime and incidents. Fear of being targeted may also mean people are reluctant to go outdoors and use public transport. This is an issue that is relevant for those living in the Park and also those visiting it.</p> <p>The Promotion of “Secure by Design” principles and community safety as part of good design can help create a safer more secure environment in terms of buildings, public transport facilities such as bus stops and layout of neighbourhoods.</p> <p>How will land use policy in the Park promote secure by design principles?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/-</p>	<p>Response Land Use Planning: This issue has been addressed through the preparation of the Local Development Plan 2. Please see the LDP2 Equalities Impact Assessment for detailed commentary.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>L2: Protect and enhance dark night skies.</p>		
<p>a) Produce and promote supplementary planning guidance for Pembrokeshire on lighting for developments requiring lighting schemes (Pembrokeshire County Council and Pembrokeshire Coast National Park Authority).</p> <p>b) Engage with communities to reduce unwanted light.</p> <p>c) Promote good practice in regard to lighting, with enforcement where appropriate, focussing on installations intervisible with Dark Sky Discovery sites.</p>		

Areas for consideration (Identified in Evidence and Feedback document)	Impact	+/-	Response/ Mitigation
<p>Age/ Disability/ Gender Reassignment / Pregnancy and Maternity / Race/ Religion or Belief/ Sex / Sexual Orientation</p> <p>Across the protected characteristics there are issues relating to people being targeted for harassment, sexual violence, domestic abuse and hate crime and incidents. Fear of being targeted may also mean people are reluctant to go outdoors and use public transport. This is an issue that is relevant for those living in the Park and also those visiting it. Younger People aged 16-24 are the age group in Wales who feel least safe walking in their local area after dark. Dark sky/ light pollution measures in an area including limited street light provision could increase the risks for some individuals and make them more vulnerable to incidents or discourage them from going out in the dark in certain areas (which could be particularly restrictive in winter time).</p> <p>How will supplementary planning guidance on lighting take into account secure by design principles and considerations? How will enforcement action take into account breaches that stem from use of light as a result of safety concerns?</p> <p>How will activities to promote Dark Skies and prevent Light Pollution take account of safety implications, will this be an issue that is addressed and discussed with communities engaged in reducing light pollution?</p>		-	<p>Response Land Use Planning: This issue has been addressed through the preparation of the Local Development Plan 2 in terms of the design policy of the Plan which will need to be read in conjunction with the Lighting Policy. Please see the Equalities Impact Assessment.</p> <p>Specific reference to minimizing light pollution while meeting Secure by Design requirements too detailed for specific inclusion in National Park Management Plan.</p> <p>Action/Amendment: No further action or amendment needed.</p> <p>Response – Project Level: Recognise that when dark skies and light pollution projects are developed in Park Area including specific community focused projects there is a need to factor in potential safety implications or concerns that people may perceive or face.</p> <p>Project Level Action: Projects focusing on light pollution/ minimisation and dark</p>

	<p>skies should consider at design and development stage secure by design principles and potential safety implications of projects and identify mechanism for concerns and issues to be mitigated. Consideration should be taken of impacts on both residents and visitors with a recognition that safety concerns could act as a barrier for some people to accessing the Park or local services/ public transport opportunities particularly in winter months. L1a and b.</p>
<p>Age / Disability / Marriage and Civil Partnership</p> <p>Children are more likely to be living in poverty than people as a whole. Single parent households were more likely to be in material deprivation than other types of households. Growth of low income families in some LSOA areas in the Park. Those living in rural areas also face increased costs and pay a premium on certain services or through necessity, for example, in housing, childcare, vehicle ownership, energy sources, fuel and food. Impact of Universal Credit, including on farming families on low incomes.</p> <p>Access to healthy food and fuel poverty particularly affects those in material deprivation.</p> <p>Working with communities on light pollution if focused also on helping households reduce the amount of energy they use, could benefit people currently facing or at risk of facing fuel poverty.</p> <p>How can light pollution reduction schemes be linked with approaches to reducing</p>	<p>+</p> <p>Response Land Use Planning: These are matters that are likely to stem from strategies employed by housing associations or other developers. The Authority could be a contributor through land use planning advice and guidance – see above.</p> <p>Action/Amendment: No further action or amendment needed.</p> <p>Response– Project Level (Collaboration): There is potential to explore the link between light pollution and reducing fuel poverty when developing projects under the following impact areas in L1: b) Engage with communities to reduce unwanted light. c) Promote good practice in regard to lighting, with enforcement where</p>

<p>fuel poverty? Are there opportunities to develop joint projects with social housing providers or fuel poverty/energy charities?</p>		<p>appropriate, focussing on installations intervisible with Dark Sky Discovery sites. In doing so there would be opportunities to explore the potential of developing joint projects with social housing providers and fuel poverty/ energy charities.</p> <p>Project Level Action (Collaboration): Explore opportunities for developing projects under L1 impact area c and b that link light pollution reduction with approaches to reducing fuel poverty, including exploring opportunities to develop joint projects with housing associations and fuel poverty/energy charities. L1a and b.</p>
<p>L3: Protect and enhance natural soundscapes.*</p>		
<p>a. Collaborate through the Pembrokeshire Greenways Partnership to provide and promote <u>accessible and affordable</u> public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.</p> <p>b. Manage proposals for intensification of use or extension of Ministry of Defence sites in accordance with Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> policy.</p>		
<p>Areas for consideration (Identified in Evidence and Feedback document) And Impact</p>	<p>+/-</p>	<p>Response/ Mitigation</p>
<p>Age/ Disability/ Pregnancy and Maternity/ Sex</p> <p>A need to remove barriers in neighbourhoods that prevent accessible active transport routes – link with issue of promoting accessible and dementia friendly neighbourhoods. Are there opportunities to engage with users to develop interactive maps of their neighbourhoods e.g. information on drop curbs etc.,</p>	<p>+/-</p>	<p>Response Land Use Policy: Look at viability of this being addressed through the Authority's revision of the Parking Standards SPG.</p> <p>Action – Engagement PCNPA: Speak to relevant Officer for further guidance in</p>

resting facilities like benches or where toilet and changing facilities are available?

Are people with mobility and other needs able to access drop off and pick up points for public transport easily in the Park?

There is a need to work with Greenways, public transport providers, community transport and local taxi firms to improve the accessible transport offer. It is important the Plan promotes innovation in this area due to the Parks location and current public transport offer, e.g. helping local taxi firms increase their accessible car fleet while greening their fleet, developing apps to help plan accessible journeys and look at how on demand apps could be used in rural setting. How will the plan foster the development of innovative accessible transport solutions?

How will the plan ensure that low carbon vehicle initiatives such as electric charging points take into account needs of disabled car users and address issues of accessibility or assistance in their design?

Note: Theme identified in Multi-agency Equality Plan consultation activities.

relation to revision of Parking Standards SPG (accessibility). L3a.

Response Outside Land Use Policy: Propose amendment to wording of L3 to reference accessible in wording. This will assist in development of projects that take account of accessibility considerations in terms of both provision and promotion of public transport, active travel and low-carbon vehicle initiatives.

Action/ Amendment: Add accessible to L3. a –“to provide and promote accessible public transport, active travel and low-carbon vehicle initiatives. L3a.

Response – Project Level (Collaboration): Recognise that there is a need for projects and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park to consider accessibility and how to overcome barriers particular users may face in terms of both access to information and accessing/ using transport options.

Project Level Action (Collaboration): Projects focusing on and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park should

	<p>consider at design and development stage of initiatives accessibility issues and how to overcome barriers particular users may face in terms of both access to information and accessing/ using transport option. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering accessibility could act as a barrier for some people to accessing the Park, services within the Park and sustainable transport options. L3a.</p>
<p>Age / Disability /Marriage and Civil Partnerships/ Race / Sex:</p> <p>A need to assist people and families in socio economic disadvantage to access affordable transport.</p> <p>How will issues of affordability be taken into account when developing and promoting sustainable transport solutions to ensure they are equitable?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/- Response Outside Land Use Policy: Propose amendment to wording of L3 to reference affordable in wording. This will assist in development of projects that take account of affordability in terms access to sustainable transport options.</p> <p>Action/ Amendment: Add “affordable” to L3. a –“to provide and promote <i>accessible and</i> affordable public transport, active travel and low carbon-vehicle initiatives. L3a.</p> <p>Response – Project Level (Collaboration): Recognise that there is a need for projects and forums addressing issues relating to sustainable transport in the Park to consider affordability and how to overcome barriers particular users may face as a</p>

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result in terms of accessing and using transport options. Projects developed under W1 impact c -Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access* (2017) will also assist with this.

Project Level Action (Collaboration): Projects focusing on and forums addressing issues relating to sustainable transport initiatives in the Park should consider at design and development stage of initiatives affordability issues and how to overcome barriers particular users may face in accessing/ using transport options. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering affordability could act as a barrier for some people to use sustainable transport options to access the Park and services within the Park. Projects and initiatives developed under W1 – c should consider potential barriers in the Park relating to affordability and sustainable transport options. **L3a.**

<p>Age/ Disability / Gender Reassignment/ Pregnancy and Maternity / Religion or Belief / Sex / Sexual Orientation:</p> <p>Due to rural nature of the Park, having access to good transport links and routes is important across a number of protected characteristics.</p> <p>In looking to promote sustainable transport what consideration has been taken of public transport routes and wider transport networks within the Park, Pembrokeshire and regionally?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p>	<p>+/- Response –Strategic Level (Collaboration): The Authority is a small supporting partner in the provision of public transport and provides a contribution to Greenways. The role of deciding routes for public transport provision lies within the remit of Pembrokeshire County Council and other transport providers.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - In looking to promote sustainable transport what consideration has been taken of public transport routes and wider transport networks within the Park, Pembrokeshire and regionally. L3a.</p>
<p>Age / Disability / Race</p> <p>One of the barrier areas identified through the Mosaic Project was the availability of information on getting to the National Park via public transport. An issue for some disabled people is often the lack of reliable information around accessible transport and location to enable them to plan a trip.</p> <p>It is important that information on transport is responsive, up to date and easy to understand and when digital is suitable for people using technology such as screen readers.</p> <p>How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and</p>	<p>+/- Response Outside Land Use Policy – Strategic Level (Collaboration): This would be addressed by the public transport providers.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group / Greenways Partnership - How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries? L3a.</p>

<p>itineraries?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p> <p style="text-align: center; opacity: 0.3; font-size: 48px; transform: rotate(-30deg);">DRAFT</p>	<p>Response – Project Level (Collaboration): There are opportunities to develop collaborative innovative projects under W1 impact c – ‘Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access (2017)</i>’ that could assist in developing improved information for users on sustainable transport options, routes and itineraries and help overcome transport related barriers to accessing the Park and use of alternatives to private car/vehicle transport.</p> <p>Project Level Action (Collaboration): Projects and initiatives should be developed collaboratively under W1 – c to help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries to help remove transport barriers to accessing the Park. W1c. L3a.</p>
<p>Age/ Disability/ Gender Reassignment / Pregnancy and Maternity / Race/ Religion or Belief/ Sex / Sexual Orientation</p> <p>Across the protected characteristics there are issues relating to people being</p>	<p>+/- Response –Strategic Level (Collaboration): This would be a matter for the transport providers in Pembrokeshire.</p>

<p>targeted for harassment, sexual violence, domestic abuse and hate crime and incidents. Fear or past experiences of being targeted may mean people are reluctant to use certain active travel routes or use public transport. This is an issue that is relevant for those living in the Park and also those visiting it.</p> <p>How can the plan facilitate actions to address potential safety concerns on active travel routes or public transport, including working with transport providers and communities?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p>		<p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the Plan facilitate actions to address potential safety concerns on active travel routes or public transport, including working with transport providers and communities? L3a.</p>
<p>Wording amendment (following 5th June 2019 NPA)</p> <p>“Manage proposals for intensification of use or extension of Ministry of Defence sites in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policy.”</p>	<p>N/A</p>	<p>Wording amendment has no impact.</p>
<p>Additional Issues to consider not addressed in above sections</p>		
<p>Areas for consideration (Identified in Evidence and Feedback document) and Impact</p>	<p>+/-</p>	<p>Response/ Mitigation</p>
<p>Age / Disability/ Gender Reassignment /Marriage and Civil Partnerships / Pregnancy and Maternity / Race / Religion or Belief / Sex / Sexual Orientation:</p> <p>The need to help support and develop community focal points/ facilities, hubs, locations for events and activities that help address social isolation and provide opportunities for people to engage with others in the Park area. A need to ensure that these facilities are inclusive and accessible.</p> <p>What community facilities are at risk in the Park area, are there less opportunities</p>	<p>+/-</p>	<p>Response Land Use Policy: The Equalities Impact Assessment for the Local Development Plan sets out how this issue is addressed in the Local Development Plan in terms of safeguarding and permitting community facilities.</p> <p>Action/ Amendment: No further action or amendment needed.</p>

for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? Are there opportunities to work with local businesses and communities in relation to provision of changing and baby changing facilities, promoting breast feeding welcoming venues, dementia friendly venues, hosting autism hours, continued hosting of beach wheelchairs?

[Note: Theme identified in Multi-agency Equality Plan consultation activities.](#)

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Response –Strategic Level

(Collaboration): Beyond land use planning it is difficult to see how the Management Plan could provide a lead on these varied matters apart from beach wheelchair provision. However it is recognised that access to toilet facilities and banks/cash machines etc. can have an impact on visitor and residents experiences and enjoyment of the Park and wider provision of community facilities could impact negatively on sustainability of communities and their experiences. External factors such as PCC toilet strategy and other plans will impact on these issues. The Authority and public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan including ‘Doing things differently’ which includes looking at how facilities and services are delivered to communities and how to respond to new challenges.

Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public

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Service Board Members to address issues facing communities within the Park area. (A Landscape for Life and Livelihoods.)

Action/ Additional Information Needed: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? (A Landscape for Life and Livelihoods.)

Action Community Level – Engagement: Topic to consider with Community Councils: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (A Landscape for Life and Livelihoods.)

Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group; What community facilities are at risk in the Park area, are there less opportunities for accessing these

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opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (A Landscape for Life and Livelihoods.)

Response – Project Level
(Collaboration): There are opportunities to develop collaborative innovative projects under W1 c – ‘Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access (2017)*,’ k – ‘Collaborate in delivery of nature-based health services, including targeted walking programmes, and supporting people living with dementia’ and H1 - a: Raise public awareness and enjoyment of historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation’. that work with local businesses and communities in terms of initiatives around increasing provision of changing and baby changing

	<p>facilities, promoting breast feeding welcoming venues, dementia friendly venues, hosting autism hours, continued hosting of beach wheelchairs.</p> <p>Project Level Action: Working with local businesses and communities in terms of initiatives around areas such as increasing provision of changing and baby changing facilities, promoting breast feeding welcoming venues, dementia friendly venues, hosting autism hours, continued hosting of beach wheelchairs. W1c and k. H1a.</p>
<p>Pregnancy and Maternity / Sex</p> <p>A need for improved affordable child care within Park area.</p> <p>How can access to affordable child care be improved in the Park area, particularly in Northern part of the Park? Is this issue within or outside the scope of the National Park Management Plan? Are there links in relation to wider PSB goals in terms of employment transformation framework and helping promotion of local child care provision businesses or offer provided by businesses themselves?</p> <p>This could positively link to other issues relating to provision of employment opportunities in the Park area.</p> <p>Are there examples of any innovative approaches elsewhere to the provision of affordable childcare in rural areas? Are there opportunities to further engage with Pembrokeshire College and organisations supporting new business starts ups,</p>	<p>-</p> <p>Response –Strategic Level (Collaboration): These suggestions appear to be beyond the scope of the Management Plan. The Welsh Government has confirmed the Childcare Offer for Wales will now be accessible to all eligible parents throughout the whole of Pembrokeshire. From 29th April 2019, all eligible working parents of 3-4 year old children living in Pembrokeshire will be able to access up to 30 hours per week of combined Childcare and Early Years Foundation Phase Education through the Childcare Offer. Issues relating to access to providers is likely to remain an issue in certain parts of the Park. The Authority and Public bodies in the Park are</p>

<p>PSB on the above issue?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan including 'Recruitment and Employment Transformation Framework.' Engagement through PSB on this issue would at this time be viewed as the appropriate forum to explore issues around child care provision in line with integrated project and findings of Pembrokeshire Well-being Assessment.</p> <p>Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. (A Landscape for Life and Livelihoods.)</p>
<p>Age</p> <p>Although formal training opportunities is referenced in the section on well-being, enjoyment and discovery which aligns with the PSB work on Employment Transformation, the plan is fairly weak in terms of addressing concerns from younger people about limited range of employment opportunities in the Park area and pay.</p> <p>Who could the Authority work with to address above issues, e.g. Pembrokeshire college, Universities, local businesses, other public bodies? Could more be done to assist new business start-ups or young people looking to start up their own</p>	<p>- Response Land Use Policy: The Equalities Impact Assessment for the Local Development Plan sets out how this issue is addressed in the Local Development Plan in terms of support for employment opportunities.</p> <p>Action/ Amendment: No further action or amendment needed.</p> <p>Response –Strategic Level (Collaboration): Acknowledge that this is</p>

business/ working self-employed in the Park? Could the plan support any recommendations or learn from the findings from the Bluestone Resorts Ltd - Feasibility Study and Business Plan for Tourism and Hospitality Vocational Training and LEADER project focused on Building Pembrokeshire's Capacity to Care.

How does the plan address any future and current employment trends including the gig economy and demand and skills development in relation to specific industries – countryside management, forestry, marine and renewable energy, tourism and recreation, agriculture, fisheries, digital industries, health and social care, education? What are the current challenges facing young people in Pembrokeshire looking to access these industries and also responses to skills around digital competency? For example skills around data collection, use of digital mapping and analysis tools that may positively impact on areas around biodiversity / carbon reduction and offsetting in agriculture (e.g. the PLANED BRICS project - <http://www.planed.org.uk/brics/>) or ensuring people in the Park area are able to take up future digital and AI opportunities. Educational offers aimed at promoting and increasing understanding of Special Qualities in the Park could provide opportunities for children to develop digital competency skills in data recording, mapping, analysis and in relation to creative digital skills.

Could further work be carried out to assist development of digital skills within agricultural sector and young people looking to work in this sector?

Would support and action in any of the above areas fall within the scope of the Plan?

Note: Theme identified in Multi-agency Equality Plan consultation activities.

an issue identified by Youth Manifesto in terms of provision of training, employment opportunities and support for small businesses. Further consideration is needed around how this is considered within the Plan. The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan including the 'Recruitment and Employment Transformation Framework.' Initiatives under this project should have a positive impact on employment opportunities for young people and others in the Park.

Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. (A Landscape for Life and Livelihoods.)

Action Community Level – Engagement: Topic to consider with Youth Rangers: Although formal training opportunities is referenced in the section on well-being, enjoyment and discovery which aligns with the PSB work on

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Employment Transformation, how could the plan better address concerns from younger people about limited range of employment opportunities in the Park area and pay. (A Landscape for Life and Livelihoods.)

Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group: Who could the Authority work with to address above issues, e.g. Pembrokeshire college, Universities, local businesses, other public bodies? Could more be done to assist new business start-ups or young people looking to start up their own business/ working self-employed in the Park? Could the Plan support any recommendations or learn from the findings from the Bluestone Resorts Ltd - Feasibility Study and Business Plan for Tourism and Hospitality Vocational Training and LEADER project focused on Building Pembrokeshire's Capacity to Care? How does the plan address any future and current employment trends including the gig economy and demand and skills development in relation to specific industries – countryside management, forestry, marine and renewable energy, tourism and recreation, agriculture, fisheries, digital industries, health and

	<p>social care, education? What are the current challenges facing young people in Pembrokeshire looking to access these industries and also responses to skills around digital competency? Could further work be carried out to assist development of digital skills within agricultural sector and young people looking to work in this sector? Would support and action in any of the above areas fall within the scope of the plan? (A Landscape for Life and Livelihoods.)</p>
<p>Age</p> <p>Issue of digital connectivity in rural area matters to young people and could play a role in developing solutions to economic/ community resilient issues.</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p> <p>Role of digital connectivity in Park not highlighted in plan. This issue needs to be considered due to link with policies around economic and social resilience and areas relating to information, engagement and service provision.</p>	<p>- Response –Strategic Level (Collaboration): Further consideration is needed of whether issues around digital connectivity in the Park (which potentially could impact on the delivery of other aspects of the plan) fall within the scope of the Plan.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group: Does the National Park Management Plan have a role in relation to supporting collaborative initiatives to improve digital connectivity in the Park, or is this outside the scope of the Plan. If yes, what impact would the Plan be looking to develop and who would need to be engaged with to support delivery of projects/ initiatives under it. (A Landscape</p>

	for Life and Livelihoods.)
<p>Age/ Disability / Gender Reassignment/ Pregnancy and Maternity / Religion or Belief / Sex / Sexual Orientation</p> <p>The current document has limited information around influencing decisions made about the Park and this needs to be captured within one of the policy/ impact sections. As part of this specific consideration is needed on how to engage diverse range of people in this, particularly due to democratic deficit in terms of diversity in governance structures in the Authority.</p> <p>How could information about the Plan and its progress be presented so that a diverse and wide range of people can engage with it?</p> <p>Are there opportunities to engage young people (and others) in campaigns for actions online (e.g. via social media) and offline to support initiatives that will assist with delivery of different areas within the plan?</p> <p>Feedback from the Mosaic project highlighted the importance of ensuring that information about the Park is made available in urban settings outside the Park in order to raise awareness and engage with a more diverse range of people.</p> <p>How could the plan improve the reach of information about the Park so that it is reaching more diverse audiences in more urban areas of Wales?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>- Response –Strategic Level (Collaboration): Recognise that the Plan currently does not capture the aim to have an ongoing conversation about the Park plan. Potential to include section on how people can influence decisions about the Park, how we engage a wide range of people on an ongoing basis (for an ‘ongoing conversation about the Park’) and also provide information on progress and issues. This could be explored as part of the Management Plan consultation.</p> <p>Action/ Amendment: Include section in Park Plan on having an ‘Ongoing conversation about the Park’ taking into account how people can influence decisions about the Park, how we engage a wide range of people on an ongoing basis and also provide information on progress and issues suitable and accessible for different audiences. (A Landscape for Life and Livelihoods.)</p> <p>Action Community Level – Engagement: Topic to consider as part of consultation: How would people like the Authority to engage with them in</p>

terms of having an 'ongoing conversation about the Park' and providing information on progress or new challenges during the Plan period? (A Landscape for Life and Livelihoods.)

Action – Engagement PCNPA:

Engagement Action Plan group to explore wording and ideas relating to section on having and 'ongoing conversation'/ engagement. (A Landscape for Life and Livelihoods.)

Equality Impact Assessment Summary

Initial considerations:

L1: Impacts relating to - Facilitating ageing in place, accessible neighbourhoods, community facilities, employment opportunities, accessible and affordable housing , Gypsy and Traveller site provision and promotion of secure by design principles.

L2: Impact relating to - Dark Sky initiatives on perceived and actual security in areas.

L3: Impacts relating to - Barriers to accessing and using active travel and public transport for some groups.

Additional considerations: Provision of community focal points and facilities within the park including toilet and changing place facilities. Child care provision in the Park. Addressing employment opportunities within the Park (current and future). Issue of digital connectivity in the park. Increasing opportunities for diverse groups to influence decisions about the Park.

Well-being, enjoyment and discovery

W1: Provide and promote sustainable outdoor recreation opportunities for all.

- a) Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences, and promote it to new audiences ([Pembrokeshire Coast National Park Authority and Pembrokeshire County Council](#)).
- b) Implement the *Rights of Way Improvement Plan 2018-2028*, in partnership with communities, user groups and client groups.
- c) Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access* (2017).
- e)d) [Collaborate in delivery of projects arising from the Pembrokeshire Well-being Plan, e.g. Celebrating the Great Outdoors.](#)
- d)e) Improve water quality at designated bathing waters achieving less than “Excellent” status²
- e)f) Manage potential / actual recreational pressures³ and site and community capacity issues such as those arising from unauthorised camping, congestion, large events and inappropriate use of watercraft⁴.
- g) Collaborate through the Destination Pembrokeshire Partnership to manage Pembrokeshire and the National Park as a sustainable destination.
- f)h) [Work collaboratively to ensure the promotion of the National Park as a destination reaches and is representative of more diverse audiences, including children and young families from deprived areas.](#)
- g)i) Collaborate through the Pembrokeshire Greenways Partnership to provide and promote [accessible and affordable](#) public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.
- h)j) Promote more frequent local participation in activities including walking, cycling, rowing, paddle-boarding, canoeing, kayaking and swimming in locations where capacity exists.
- i)k) Collaborate to enable public access to water where appropriate for quiet enjoyment.

² ~~Broad Haven Central, Little Haven, Newport North, Nolton Haven, Sandy Haven.~~

³ Including those identified in *Enjoying the Pembrokeshire Coast National Park. A Plan to provide and manage opportunities for Sustainable Recreation in the National Park.*

⁴ Sites include Abereiddi, Abermawr, Barafundle and Stackpole Quay, Cwm yr Eglwys, [Freshwater East](#), Freshwater West, Martin’s Haven, Porthgain, Pwllgwaelod, St Justinian, Strumble and Whitesands.

<p>j)l) Manage the Milford Haven Waterway in line with the <i>Milford Haven Waterway 5 Year Recreation Management Plan 2016</i>, and enforce Waterway, harbour, beach and byelaws.</p> <p>k)m) Collaborate in delivery of nature-based health services, including targeted walking programmes, mental health initiatives, and supporting people living with dementia.</p> <p>l)n) Deliver the Pembrokeshire Beach Strategy and prepare and deliver a Foreshore Management Plan.</p> <p>m)o) Manage recreational disturbance to species and species groups such as cliff-nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.</p>		
Areas for consideration (Identified in Evidence and Feedback document) and impact	+/-	Response/ Mitigation
<p>Age / Disability</p> <p>Disabled people are less likely to participate in leisure, arts and recreational opportunities. Barriers include inaccessible facilities or lack of appropriate facilities or equipment, transport and lack of appropriate information and awareness of what is available.</p> <p>Significant engagement, research and information is available on barriers and potential options and actions that could improve access to recreation and walking opportunities in the Park for disabled people due to work carried out as part of the Coastal Forums Recreational Audit for Disabled Access Pembrokeshire and PCC and PCNPA's recent review of the Rights of Way Improvement Plan.</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities. Issue of beach access, in particular Newgale highlighted and having support/ someone to push beach wheelchairs.</p> <p>The current impact section references both of these. What initial opportunities/ learning have been identified from the current accessible and inclusive audit review of PCNPA sites?</p>	+	<p>Response – Project Level (Access Opportunities): Will be addressed through projects and initiatives developed in response to W1 impacts: a. Manage the Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, to provide a diversity of experiences, and promote it to new audiences. b) Implement the <i>Rights of Way Improvement Plan 2018-2028</i>, in partnership with communities, user groups and client groups. c) Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access (2017)</i>.</p>

<p>How can the provision of the following be supported and increased in the Park area:</p> <ul style="list-style-type: none"> • auxillary aids (beach wheelchairs, mobility scooters) and adapted recreation equipment • facilities such as accessible toilets, changing places and provision of outdoor seats in suitable locations. This includes looking at the impact of PCC's toilet strategy on provision of toilets in the Park.⁵ <p>Are there opportunities to develop maps that users can feed into with information on accessible routes in locations and access to different facilities from a lived experience?</p> <p>How will the plan ensure that management mechanisms used to deal with recreational conflict and pressure point locations do not unfairly disadvantage or discriminate disabled people, for example ensuring continued access to sites for private vehicles with blue badges? Effective management mechanisms at locations could also assist with access helping to remove vehicles obstructing pavements and drop curbs.</p>	<p>Development of projects in these areas would also help the delivery of impact g. Promote more frequent local participation in activities including walking, cycling, rowing, paddle-boarding, canoeing, kayaking and swimming in locations where capacity exists.</p> <p>Project Level Action: Addressing issues relating to barriers in leisure, arts and recreational opportunities for disabled people through development of projects. W1a, b and c.</p> <p>Action – Engagement PCNPA: What initial opportunities/ learning have been identified from the current accessible and inclusive audit review of PCNPA sites? W1c.</p> <p>Response Land Use Policy (Community Facilities): The Equalities Impact Assessment for the Local Development Plan sets out how this issue is addressed in</p>
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⁵ PCC draft toilet strategy: https://www.pembrokeshire.gov.uk/objview.asp?object_id=5484&language=

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the Local Development Plan in terms of safeguarding and permitting community facilities.

Action/ Amendment: No further action or amendment needed.

Response – Strategic Level /Project Level (Facilities):

Beyond land use planning it is difficult to see how the Management Plan could provide a lead on these varied matters apart from beach wheelchair provision and provision of resting places (benches) on coastal path routes or centres / land owned by Authority. However it is recognised that access to suitable toilet facilities and changing places can have an impact on visitor and residents experiences and enjoyment of the Park. External factors such as PCC toilet strategy and other plans will impact on these issues. The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire. There are 8

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integrated projects under the plan including 'Doing things differently' which includes looking at how facilities and services are delivered to communities and how to respond to new challenges.

Action / Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. (Well-being, enjoyment and discovery.)

Project Level Action: Addressing issues relating to provision of Beach Wheelchairs and resting places (benches) on PROW routes and Authority owned land/ facilities through development of projects. **W1a, b and c.**

Response – Project Level (Management Mechanisms): In terms of management mechanisms individual proposals will need to consider equality

	<p>impacts.</p> <p>Project Level Action: Individual Proposals for Management mechanisms used to deal with recreational conflict and pressure point locations will need to consider equality impacts to ensure they do not unfairly disadvantage or discriminate against disabled people and can put in place mitigating actions where needed. W1d.</p>
<p>Age/ Disability / Gender Reassignment / Race / Religion or Belief / Sexual Orientation</p> <p>Representation is a major barrier for ethnic minorities and other groups which feel excluded from the National Parks. The Champions in the Mosaic projects clearly articulated that when websites and other communications fail to include images of ethnic minority people, it conveys a message that the National Parks are “not for people like me”.</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p> <p>Are there opportunities to make destination promotion of the Park more inclusive? Has the library of images created as part of the Mosaic Project been kept up to date and used? Are images of ethnic minority people well represented across the National Park website and other websites promoting the destination to ensure they reflect the ethnic diversity of the Welsh population and wider potential visitor population? Could we learn from <u>Diversify outdoors</u> a US coalition of social</p>	<p>- Response– Strategic Level /Project Level: Recognise that impacts W1. c ‘Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access</i> (2017).’ and impact e ‘Collaborate through the Destination Pembrokeshire Partnership to manage Pembrokeshire and the National Park as a sustainable destination’ do not fully address issues raised here (and priorities identified in Welsh Government’s Valued and</p>

media influences– bloggers, athletes, activists and entrepreneurs – who share the goal of promoting diversity in outdoor spaces where people of colour, LGBTQIA, and other diverse identities have historically been underrepresented. They use social media as a tool for increasing access and representation in the outdoors. **Are there opportunities to develop campaigns that through increasing user generated content of images of diverse people (themselves, friends, families) in the Park (and other Parks in the UK) help increase representation, visibility and reach of the destination through people’s own online and social networks?**

How can we ensure information about the Park is promoted in more urban areas, community hubs and urban events such as Mela’s and Pride to enable destination promotion to reach wider audiences?

Is there a need to revisit the development of community champions and further engage with diversity outdoors following the ending of the Mosaic Project? What mechanism could help the sustainability of such initiatives, particularly in the context that some community based organisations supporting ethnic minority people are no longer in place due to financial constraints.

16% of UK visitor groups surveyed in 2016 in Wales contained someone with a long term illness or disability. 56% gave Wales a score of 5 to 8 out of 10 for accessibility. A comment from the survey highlighted the issue of lack of accessible taxis in Tenby. 16% of UK Staying visitors in Wales surveyed in 2016 had a long term illness or disability. 63% gave Wales a score of 5 to 8 out of 10 for accessibility. 8% of overseas visitor to Wales surveyed in 2016 have a long term illness or disability. 66% gave Wales a score of 5 out of 10 for accessibility. People with health conditions & impairments and their travelling companions spend around £12 billion on trips in England each year, but an additional £117

Resilient document’. Potential to add to wording to the end of impact e - Work collaboratively with others to ensure the promotion of the Park as a destination reaches and is representative of more diverse audiences. This would help at project level the development of projects and initiatives to address issues identified in Mosaic Project, learn from Diversify Outdoors user generated promotion of the outdoors, engagement with urban communities and events (Pride, Mela’s) and other online platforms and forums. This could be an objective or action within the Authority’s own revised equality action plan.

Action/ Amendment: Add to impact e, ‘Work collaboratively ~~with others~~ to ensure the promotion of the Park as a destination reaches and is representative of more diverse audiences.’ – ‘Collaborate through the Destination Pembroke Partnership to manage Pembroke and the

<p>million could be generated from additional trips if accessibility was improved.</p> <p>Consideration is needed of how the Park can be promoted and marketed as an accessible tourist destination (for people with a wide range of disabilities.) Particularly in relation to campaigns targeting visitors and international markets and information provided about what is available in the Park. Are there opportunities to raise profile of opportunities in the park through social media and relevant disability tourism online forums ? Could we learn from others and do accessible mapping integrating the Authority's Walks for All maps into neighbourhood maps that provide information on drop curbs, toilet facilities and accessible parking bays, with the added benefit of helping residents plan active travel routes? Are there opportunities to use digital technology to improve disabled people's visitor experiences? For example http://www.assist-mi.com/ is an example of use of new technology to improve disabled people's experiences and make it easier for businesses to meet their needs. These activities could link into wider activities currently at an Authority level being undertaken such as the Access and Inclusion review of sites, Parkwise branding and strategic involvement in destination management.</p> <p>Is the information we provide visitors relating to the Special Qualities, interpretation material, what is available and how to behave (e.g. lighting fires, walking with dogs, water safety, drones etc.) or encouraging use of sustainable transport suitable for visitors with different access or needs associated with a disability?</p> <p>Insight into LGBT Travel and Perception from Scotland highlighted the following additional considerations for LGBT Travellers that could be applied to a Welsh National Park setting: how welcome they would be at certain destinations (particularly in more rural settings), how they would be treated at their</p>	<p>National Park as a sustainable destination. Work collaboratively with others to ensure the promotion of the Park as a destination reaches and is representative of more diverse audiences'. W1e. Note: additional action has been included in document.</p> <p>Project Level Action: Develop projects that support the promotion of the Park as a destination to more diverse audiences and that its portrayal as a destination is more representative through W1: e (Dependent on amendment being included). W1e. Note: additional action has been included in document.</p>
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<p>accommodation, how safe they would be walking down the street.</p> <p>How could we promote and market the Park as an LGBT friendly destination particularly when targeting visitors and international markets? Is there additional information that we could provide about what is available in the Park e.g. “LGBT friendly things to do and see on tourism/ event websites.” Visit Wales has a page called pride of Wales, are there opportunities to further develop the Pembrokeshire and Park offer on this page.</p> <p>Schemes such as Parkwise could include advice around inclusive tourism This includes thinking about the range of demographic of tourists who may visit and stay in the Park e.g. LGB parents and children on family holidays at caravan sites, through to older people perhaps staying in the north of the county, to younger people taking up sport / recreational opportunities.</p>		
<p>Age / Disability</p> <p>Quality and access to the outdoors is important to young people. Peace and Quiet important for older people in Pembrokeshire. The natural environment could be used as a potential asset to attract / retain young people in the Park/ Pembrokeshire Area.</p> <p>The quality of external environment can impact on physical activity levels of different age groups and play an important role in terms of facilitating participation in the outdoor. Access to outdoor play can have positive impact on children’s physical, mental, social and emotional health and wellbeing and wider development. This is important in the context of the wider Adverse Childhood Experience agenda. For the park area this could include maintaining the quality of the outdoor environment, identifying areas within the Park where there is less</p>	<p>+/-</p>	<p>Response Land Use Policy: This issue has been addressed through the review of the Local Development Plan. The Equalities Impact Assessment provides further advice concluding that in general the National Park is well served by open space.</p> <p>Action/ Amendment: No further action or amendment needed.</p> <p>Response – Project Level: Projects developed under Impact W1 c “Remove barriers to outdoor</p>

access to the outdoors, provision of outdoor play areas and outdoor gym facilities. Maintaining quality of experience on Coast Path is important in terms of ensuring its role in facilitating participation in the outdoors.

Are there certain locations and communities within the Park where there is less access or barriers to access to the outdoors, including for outdoor play? How can the Plan help people with less opportunities to access the outdoors in more urban environment gain access and participate in physical activity through the Park's outdoor environment?

Supported walking opportunities could play an important role as a gateway to physical activity for older people.

It is positive that the Plan is looking to address issue around water pollution and quality of bathing water. Poor water quality could impact on people taking up physical activity opportunities in the sea and waterways, for example open water swimming. Potential negative health impact on people who participate in activities in the sea where there is poor water quality.

[Note: Theme identified in Multi-agency Equality Plan consultation activities.](#)

recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access* (2017).” And W2 impact: a. Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).’ Could help increase access for people in more urban areas to participate in and benefit from opportunities in the Park to access the outdoors.

Project Level Action: Develop projects that support people with less opportunities to access the outdoors in more urban environment to gain access, participate in opportunities and benefit from the Park's outdoor environment. **W1c and W2a.**

<p>Age / Disability / Marriage and Civil Partnership / Race / Religion or Belief/ Sex/ Socio Economic</p> <p>Assisting people and families in socio economic disadvantage to access affordable transport and recreational opportunities within the Park.</p> <p>How can the plan increase access to recreation opportunities in the Park for people in Pembrokeshire and further afield who are living in poverty and face barriers to access? Are there opportunities to link in with schemes such as family holiday initiative or schemes that can reduce transport costs? Are there opportunities to work jointly with Gingerbread, local social housing and supported housing providers (locally and further afield), recreational providers and tourism trade on joint projects?</p> <p>Any interventions that have financial implications including those linked to transport could have negative impact, for example interventions aimed to reduce pressure on certain locations in the Park. How will issues of affordability be taken into account when developing and promoting sustainable transport solutions to ensure they are equitable? What can be put in place to ensure these considerations are taken into account when interventions are developed?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/- Response: Propose adding word affordable where impacts reference sustainable transport options. This will assist in development of projects that take account of affordability in terms access to sustainable transport options. See previous response in relation to strategic engagement.</p> <p>Action/ Amendment: Add affordable to impacts where reference is made to sustainable transport options e.g. <i>accessible and affordable public transport, active travel and low carbon-vehicle initiatives. W1g.</i></p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the Plan help address affordability issues that may impact on people accessing sustainable transport options in the Park area. W1g.</p> <p>Response – Project Level: Projects developed under Impact W1 c “Remove barriers to outdoor recreation / wellbeing opportunities, including transport</p>
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barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access (2017)*.” And W2 impact: a. Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).’ could help increase access for people in more urban areas to participate in and benefit from opportunities in the Park to access the outdoors

Project Level Action: Develop projects that support people with less opportunities to access the outdoors in more urban environment to gain access, participate in opportunities and benefit from the Park’s outdoor environment. **W1c. W2a.**

Response– Strategic/ Project Level (Collaboration): At a

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strategic level this would be addressed by the public transport providers. Recognise that there is a need for projects and forums addressing issues relating to sustainable transport in the Park to consider affordability and how to overcome barriers particular users may face as a result in terms of accessing and using transport options.

Project Level Action (Collaboration) – Affordable Sustainable Transport: Projects focusing on and forums addressing issues relating to sustainable transport initiatives in the Park should consider at design and development stage of initiatives affordability issues and how to overcome barriers particular users may face in accessing/ using transport options. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering affordability could act as a barrier for some people to use sustainable transport options to access the Park and services

		<p>within the Park. Projects and initiatives developed under W1 – c should consider potential barriers in the Park relating to affordability and sustainable transport options. W1c and g.</p>
<p>Disability/ Gender Reassignment / Race / Religion or Belief / Sexual Orientation</p> <p>Inequalities in health outcomes affect a number of groups across the protected characteristics. It is important to ensure that developments around social prescribing and nature based health services are inclusive.</p> <p>The Authority and other partner organisations should learn in the design and delivery of projects from reports of negative experiences some LGB people have had in terms of access to health services and ensure that services provided are inclusive and LGB friendly.</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p> <p>People who have had negative experiences via health service may respond positively to alternative options delivered by other organisations (as long as these services are inclusive for example LGBT friendly). It is important that organisations don't solely rely on health practitioners and services for referrals as for example LGBT people may not be engaging with these services due to fear of discrimination / negative past experiences. Having alternative referral routes and linking in with other third sector groups including LGBT groups will assist with this.</p> <p>How can the plan support training of nature based health service providers to</p>	<p>+</p>	<p>Response – Project Level: This will be addressed at Project level in relation to impact W1 b. “Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access</i> (2017).” and g. “Collaborate in delivery of nature-based health services, including targeted walking programmes, and supporting people living with dementia.” and ensuring services developed and designed at Project Level are delivered in an inclusive manner, take account of referral routes and consider involvement with Stonewall Cymru’s rainbow laces campaigns or similar campaigns and schemes.</p>

<p>ensure that they design and deliver inclusive services, one negative comment or experience may result in disengagement from services? Are current services being delivered in an inclusive manner? Are a variety of referral routes provided?</p> <p>Evaluation and monitoring of services to ensure that they are inclusive will be important and to ensure continued promotion of best practice in this area.</p> <p>For those opportunities involving walking or fitness activities there is the potential for organisations to link in with Stonewall Cymru's rainbow laces campaign. How could the plan support the promotion of the Stonewall Cymru's rainbow laces campaign in the Park?</p>	<p>Project Level Action: Projects focusing on and forums addressing issues relating to health and well-being should consider at design and development stage of initiatives potential barriers people may face and how to ensure a service is inclusive. In particular how people's past experiences of health services may impact on their engagement with a project and how projects linked to walking/ physical activity could get involved with Stonewall Cymru's rainbow laces campaign and other similar opportunities. W1c and k.</p>
<p>Age / Disability</p> <p>The park has an ageing population with a potential associated need for support in the community and preventative care. An expected increase in the future of the number of people with Dementia in Pembrokeshire.</p> <p>Initiatives such as Solva Care and LEADER project on Building Pembrokeshire's Capacity to Care are looking at localised community focused approaches to delivery of care and support.</p> <p>Does support for initiatives such as these that promote and look to address longer</p>	<p>+/- Response – Project Level: There is potential to address some of these issues at project level through the following impact areas identified in W1: Impact Area k – Collaborate in delivery of nature-based health services, including targeted walking programmes, and supporting people living with dementia. Impact area c - Remove barriers to outdoor recreation / wellbeing</p>

<p>term community resilience in the Park fall within the scope of the plan?</p> <p>St David's is a dementia friendly city. How could the plan promote more locations within the Park to gain Dementia Friendly status?</p> <p>How is the Plan promoting dementia neighbourhoods and the provision of facilities such as changing places and toilets? Are there opportunities to identify or develop 'landmarks' in the park to assist people with navigation?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities – issue of reduction in care and support services noted.</u></p>	<p>opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access</i> (2017).</p> <p>Project Level Action: Addressing issues relating to age and dementia-friendly neighbourhoods through development of projects. W1c and k.</p>
<p>Age / Disability / Pregnancy and Maternity / Sex</p> <p>Access to the outdoors with the right support can have positive impact on mental well-being for those with mental ill health. Despite an increase in funding, mental health provision in Wales is not meeting demand. The number of people waiting for mental health treatment has doubled in the past six years.</p> <p>The Plan does recognise the role the Park, nature based health services and supported walking opportunities can play in relation to supporting people with mental health conditions or preventing deterioration in someone's mental health. It would benefit from referencing wider opportunities for social proscrying in the park in relation to heritage and cultural opportunities in the Park, for example painting.</p> <p>A key issue for young people in Pembrokeshire is mental health and mental</p>	<p>+/- Response – Policy/ Project Level (Collaboration): Add explicit reference to mental health in relation to areas listed under W1. k - Collaborate in delivery of nature-based health services, including targeted walking programmes, and supporting people living with dementia.” Mental health related projects including those targeted at young people or working with other organisations and communities on suicide prevention could be developed under this project. Projects relating to early years</p>

health services for young people. 10% of Pembrokeshire’s children have mental health issues such as stress, anxiety and depression. The National Park has beneficial assets which could be used to develop projects specifically aimed at young people and their mental well-being. **How could the plan support and develop social prescribing initiatives and related projects targeting younger age groups (current models are not necessarily designed/aimed for this age group)?** This could include working with Children and Adult Mental Health Services, Schools and other agencies in terms of referral routes and the design of initiatives.

Up to one in five women in Wales is affected by perinatal mental illness. Compared with the UK average of 40%, 70% of people in Wales have no access to specialist perinatal mental health services. The Park has potential in terms of its well-being offer to assist and benefit new and expectant mothers and their partners (Mental Health, Positive Early Years). Particularly in the context of rural isolation for those living in the Park. **Are there opportunities to further engage mother and toddler groups, community groups and organisations focused on early years, health providers and health visitors for their views on opportunities in this area?**

A significant number of people die due to suicide every year in Wales, with men aged 40-44 at particular risk and those working within particular sectors – agriculture, construction. Agencies other than health services can play an important role in suicide prevention as seen with the Wexford Marine Watch. Coastal nature of the park area can play a factor in terms of incidents with a need to intercept people who may be in difficulty at the right time before they harm themselves.

How can the plan support and promote joint initiatives relating to suicide

could also be developed under current W2. A Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).

Action/ Amendment: Add mental health related projects to W1k – “Collaborate in delivery of nature-based health services, including targeted walking programmes, **mental health related projects** and supporting people living with dementia.” **W1k.**

Project Level Action (Collaboration): Addressing issues relating to mental health including projects focused on mental health and young people and those looking at suicide prevention through development of projects under W1k. Addressing mental health issues that can face expectant and new parents through development of

<p>prevention and support targeting particular sectors and communities within the Park, for example those aimed at agricultural communities?</p> <p>Could specific training be provided as part of Parkwise or another initiatives to local businesses, staff who are out and about e.g. wardens and other volunteers so that they are able to intercept people who may be in difficulty at the right time before they harm themselves?</p> <p>Linked to foreshore management work around data mapping work in relation to wider incidents on the foreshore is there a need to develop a similar scheme to the Wexford MarineWatch focused on both suicide prevention and water safety or target information such as Posters or signs with number for Samaritans etc. at any specific sites within the Park?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities – particularly mental health for young people and pregnant/ new parents. Stakeholder engagement with VC Gallery captured the importance of engaging with service users when designing projects.</u></p>		<p>projects. W1k, W2a.</p>
<p>Age/ Disability/ Gender Reassignment / Pregnancy and Maternity / Race / Religion or Belief/ Sex/ Sexual Orientation / Socio Economic</p> <p>Loneliness and social isolation is an issue effecting both younger and older people in Pembrokeshire. This can have a negative impact on mental health, however Individuals aged 65-74 years and 16-24 years are more likely to volunteer in Wales than other age groups. There is a lack of social opportunities for young people in Pembrokeshire. People who are LGBT, from religious or ethnic minority groups are likely to be at risk of isolation due to the rural/ small town nature of the Park and its demographics. Disabled people and carers, families on low incomes and expectant and new mothers are also at risk of social</p>	<p>+/-</p>	<p>Response – Project Level (Collaboration): Initiative relating to addressing loneliness and social isolation alongside Intergenerational Activities could be developed under a number of policy areas in the document: W2 .c -Offer volunteering / citizen science and formal training opportunities. W1. k - Collaborate in delivery of nature-based health services,</p>

<p>isolation particularly due to barriers that may prevent them from accessing opportunities.</p> <p>How could the plan help foster intergenerational activities that could help address social isolation (for example intergenerational nature and heritage focused projects or recreational activities – community walks)?</p> <p>Community run facilities such as pubs could offer opportunities for communities to come together.</p> <p>The need to help support and develop community focal points/ facilities, hubs, locations for events and activities that help address social isolation and provide opportunities for people to engage with others in the Park area. A need to ensure that these facilities are inclusive and accessible.</p> <p>What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities?</p> <p>Are there opportunities to work with local businesses and communities in relation to provision of changing and baby changing facilities, promoting breast feeding welcoming venues, dementia friendly venues, hosting autism hours, continued hosting of beach wheelchairs, use of rainbow flag, hosting LGBT month or Black history month events? (See comments in section re H1 and H2 impacts)</p> <p>Although the Park and Pembrokeshire has limited opportunities for going out it does have potential in relation to pop up cultural, music and recreational events that could provide more social opportunities in the Park. How could the Park</p>	<p>including targeted walking programmes, mental health related projects and supporting people living with dementia. H2 c</p> <p>-Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity. There are opportunities to use projects developed under H2 to engage wider audiences with the Park, its special qualities and where Authority is encouraging certain behaviours to help protect the Park. Learning from work of the Summer Rangers and events such as the Cragen beach events with Small World Theatre. At project level under these impacts there are also opportunities to work with local businesses and communities in terms of initiatives that can foster community engagement through increasing provision of changing and baby changing facilities, promoting breast feeding welcoming venues, dementia friendly venues, hosting autism hours, continued hosting of beach wheelchairs</p>
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support initiatives like this while also ensuring they are sensitive to sustainability considerations?

Note: Theme identified in Multi-agency Equality Plan consultation activities.

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Project Level Action (Collaboration): Addressing issues relating to loneliness, social isolation and promoting intergenerational activity through projects developed under W1.c, W1.k, W2.c and H2 c. Consider how nature of cultural activities under H2 c could be expanded to reach new audiences and enable Authority to pass on Park messages/ information on how people can help protect the Park. **W1c and k. W2c. H2c.**

Response Land Use Policy (Community Facilities): The Equalities Impact Assessment for the Local Development Plan sets out how this issue is addressed in the Local Development Plan in terms of safeguarding and permitting community facilities.

Action/ Amendment: No further action or amendment needed.

Response – Strategic Level (Collaboration): Beyond land use planning it is difficult to see how the Management Plan could provide a lead on these varied

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matters apart from beach wheelchair provision. However it is recognised that access to toilet facilities and banks/cash machines and loss of wider provision of community facilities could impact negatively on sustainability of communities and their experiences. The Authority and public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan including 'Doing things differently' which includes looking at how facilities and services are delivered to communities and how to respond to new challenges.

Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. (Well-being, enjoyment and discovery.)

Action/ Additional Information

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Needed: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? (Well-being, enjoyment and discovery.)

Action Community Level – Engagement: Topic to consider with Community Councils: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (Well-being, enjoyment and discovery.)

Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in

		<p>certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (Well-being, enjoyment and discovery.)</p>
<p>Age/ Disability/ Pregnancy and Maternity/ Sex</p> <p>A need to remove barriers in neighbourhoods that prevent accessible active transport routes – link with issue of promoting accessible and dementia friendly neighbourhoods. This includes ensuring interventions developed for pressure point locations do not impact on the accessibility of routes or mean that a disabled person is now unable to access a location due to for example accessible parking bays no longer being available.</p> <p>Are there opportunities to engage with users to develop interactive maps of their neighbourhoods e.g. information on drop curbs etc., resting facilities like benches or where toilet and changing facilities, accessible parking are available? Could these be integrated with Walks for All maps? Are people with mobility and other needs able to access drop of and pick up points for public transport easily in the Park?</p> <p>Is the information we provide visitors providing sufficient information to assist disabled people with specific access and transport needs to use sustainable transport options?</p>	<p>+/-</p>	<p>Response Outside Land Use Policy: Propose amendment to wording of W1f to reference accessible in wording. This will assist in development of projects that take account of accessibility considerations in terms of both provision and promotion of public transport, active travel and low-carbon vehicle initiatives.</p> <p>Action/ Amendment: Add accessible to W1. g - Collaborate through the Pembrokeshire Greenways Partnership to provide and promote <i>accessible</i> public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.</p> <p>Response – Project Level</p>

There is a need to work with greenways, public transport providers, community transport and local taxi firms to improve the accessible transport offer. It is important the plan promotes innovation in this area due to the Parks location and current public transport offer, e.g. helping local taxi firms increase their accessible car fleet while greening their fleet, developing apps to help plan accessible journeys and look at how on demand apps could be used in rural setting. **How will the plan foster the development of innovative accessible transport solutions?** For example <http://www.assist-mi.com/> is an example of use of new technology to improve disabled people's experiences and make it easier for businesses to meet their needs.

How will the plan ensure that low carbon vehicle initiatives such as electric charging points take into account needs of disabled car users and address issues of accessibility or assistance in their design?

[Note: Theme identified in Multi-agency Equality Plan consultation activities.](#)

(Collaboration): Recognise that there is a need for projects and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park to consider accessibility and how to overcome barriers particular users may face in terms of both access to information and accessing/ using transport options.

Project Level Action

(Collaboration): Projects focusing on and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park should consider at design and development stage of initiatives accessibility issues and how to overcome barriers particular users may face in terms of both access to information and accessing/ using transport option. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering accessibility could act as a barrier for some people to accessing the Park, services

	<p>within the Park and sustainable transport options. W1g.</p> <p>Response – Project Level (Traffic Management Mechanisms): In terms of management mechanisms individual proposals will need to consider equality impacts.</p> <p>Project Level Action: Individual Proposals for Management mechanisms used to deal with recreational conflict and pressure point locations will need to consider equality impacts to ensure they do not unfairly disadvantage or discriminate against disabled people and can put in place mitigating actions where needed. W1d and f.</p>
<p>Age / Disability /Marriage and Civil Partnerships/ Race / Sex:</p> <p>A need to assist people and families in socio economic disadvantage to access affordable transport.</p> <p>How will issues of affordability be taken into account when developing and promoting sustainable transport solutions to ensure they are equitable? This includes ensuring interventions developed for pressure point locations do not unfairly disadvantage those with limited income.</p>	<p>- Response – Strategic/ Project Level (Collaboration): At a strategic level this would be addressed by the public transport providers. Recognise that there is a need for projects and forums addressing issues relating to sustainable transport in the Park to consider affordability and how to overcome barriers particular users may face as a result in</p>

Note: Theme identified in Multi-agency Equality Plan consultation activities.

terms of accessing and using transport options.

Action/ Amendment: Add affordable to W1. g - Collaborate through the Pembrokeshire Greenways Partnership to provide and promote *accessible and affordable* public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations. **W1g.**

Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the plan help address affordability issues that may impact on people accessing sustainable transport options in the Park area. **W1g.**

Response – Project Level: Projects developed under Impact W1 c “Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented

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in the *Recreational Audit for Disabled Access* (2017).” And W2 impact: a. Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).’ could help increase access for people in more urban areas to participate in and benefit from opportunities in the Park to access the outdoors

Project Level Action (Collaboration) Projects focusing on and forums addressing issues relating to sustainable transport initiatives in the Park should consider at design and development stage of initiatives affordability issues and how to overcome barriers particular users may face in accessing/ using transport options. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering affordability could act

	<p>as a barrier for some people to use sustainable transport options to access the Park and services within the Park. Projects and initiatives developed under W1 – c should consider potential barriers in the Park relating to affordability and sustainable transport options. W1c and g.</p>
<p>Age / Disability / Race</p> <p>One of the barrier areas identified through the Mosaic Project was the availability of information on getting to National Park via public transport. An issue for some disabled people is often the lack of reliable information around accessible transport and location to enable them to plan a trip.</p> <p>It is important that information on transport is responsive, up to date and easy to understand and when digital is suitable for people using technology such as screen readers.</p> <p>How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries? Are there opportunities to develop “smarter travel” pilots to test joined-up sustainable transport options and new types of on-demand, app-based transport normally seen in urban areas?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p>	<p>- Response –Strategic Level (Collaboration): This would be addressed by the public transport providers.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries? W1c and g.</p> <p>Response Outside Land Use Policy – Project Level (Collaboration): There are opportunities to develop collaborative innovative projects under W1 impact c –‘Remove barriers to outdoor recreation /</p>

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	<p>wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access (2017)</i> that could assist in developing improved information for users on sustainable transport options, routes and itineraries and help overcome transport related barriers to accessing the Park and use of alternatives to private car/vehicle transport.</p> <p>Project Level Action (Collaboration): Projects and initiatives should be developed collaboratively under W1 – c to help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries to help remove transport barriers to accessing the Park. W1c and g.</p>
<p>Age / Sex</p> <p>Childhood obesity is a growing issue in Pembrokeshire. Boys are more likely to</p>	<p>+/- Response –Strategic Level (Collaboration): This is the role of the County Council for which the Authority provides comment.</p>

<p>be physically active than girls in Wales.</p> <p>Are there opportunities to work with schools, parents and young people to look at ways to promote and encourage active travel in terms of walking and cycling to schools in the Park area? What are the barriers that may currently prevent children and parents from choosing active travel options?</p>		<p>Action/ Amendment: No further action or amendment needed.</p>
<p>Age/ Disability/ Gender Reassignment / Pregnancy and Maternity / Race/ Religion or Belief/ Sex / Sexual Orientation</p> <p>Across the protected characteristics there are issues relating to people being targeted for harassment, sexual violence, domestic abuse and hate crime and incidents. Fear or past experiences of being targeted may mean people are reluctant to visit certain locations, use certain active travel routes or use public transport. This is an issue that is relevant for those living in the Park and also those visiting it.</p> <p>How can the plan facilitate actions to address potential safety concerns at locations or for active travel routes or public transport, including working with transport providers and communities? How are issues of offensive graffiti dealt with in the Park area?</p> <p>People who have experienced incidents may change their behaviour in terms of accessing the outdoors in an attempt to mitigate future incidents. Providers of volunteering, outdoor engagement activities, supported walking and other well-being initiatives in the Park could play an important part in building confidence and enabling victims of crime, harassment, domestic abuse, sexual violence, hate crime to access the outdoors and other positive opportunities in the Park.</p>	<p>+/-</p>	<p>Response –Strategic Level (Collaboration): In the main this would be beyond the remit of the Management Plan. Offensive graffiti on land owned or management by the Authority would be cleaned off by the Authority. This would be a matter for the transport providers in Pembrokeshire.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the plan facilitate actions to address potential safety concerns on active travel routes or public transport, including working with transport providers and communities? W1g.</p> <p>Response– Project Level (Collaboration): There are opportunities to develop</p>

Note: Theme identified in Multi-agency Equality Plan consultation activities.

collaborative projects under W1 impact c –‘Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access (2017)*’, W2 .c - Offer volunteering / citizen science and formal training opportunities’, W1. k - Collaborate in delivery of nature-based health services, including targeted walking programmes, *mental health related projects* and supporting people living with dementia. to engage with people to build their confidence and enable victims of crime, harassment, domestic abuse, sexual violence, hate crime to access the outdoors and other positive opportunities in the Park.

Project Level Action (Collaboration): Projects developed were appropriate under W1 c, W2 c, and W1 k should engage with relevant

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		<p>organisations and agencies to provide opportunities for people who have been victims of crime, harassment, domestic abuse, sexual violence, hate crime to regain their confidence (if relevant) to access the outdoors and benefit from other positive and confidence building opportunities within the Park. W1c, k. W2c.</p>
<p>Religion or Belief</p> <p>2018/19 Summer Ranger report noted that beaches in Park area are being used by mission churches. A number of other sites within the Park are significant for religious and faith-based groups and are potential points of pilgrimage or focal points for celebrations.</p> <p>How can the Plan assist community cohesion and use of shared spaces for those visiting an using an area for religious purposes and those visiting location for other reason?</p>	<p>+</p>	<p>Response – Policy/ Project Level: Addressed through impact ‘H2 d - Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings.’ and policy level responses under this.</p> <p>Engagement PCNPA Staff: Use of beaches re mission churches and use of heritage sites for worship/ celebrations: Seek feedback on extent of issue. Is impact/action sufficient? Are there any considerations for Project Level actions/response? H2d.</p>
<p>Age / Disability / Race / Sex</p> <p>Is the information we provide visitors and people living locally aimed at preventing recreational conflicts or encouraging certain behavior (e.g. around wildlife, lighting</p>		<p>Response Outside Land Use Policy – Project Level: These issues would need to be addressed at project level when</p>

fires, walking with dogs, drones) and aimed at promoting sustainable transport suitable and accessible for residents and the diverse and wide range of visitors to the Park.

How can the plan ensure that messages and information reaches different audiences and in a format that they can access and understand? Taking into account the use of plain English, accessible formats, use of pictures and meeting the needs of people whose first language is not English or Welsh, using digital channels to engage with some groups and where we provide information. **How can interactive activities be developed to help people learn in practice how to engage with outdoors without causing harm, this could be particularly beneficial for people with limited experience of the countryside or who struggle with written information?**

Are there opportunities to work with existing online networks to launch joint social media action campaigns? Important to ensure online engagement and spaces are safe environments for people.

Role of digital connectivity in Park not highlighted in plan. Issue needs to be considered due to link with information, engagement and service provision.

[Note: Theme identified in Multi-agency Equality Plan consultation activities.](#)

developing responses to W1 d - Manage recreational disturbance to species and species groups such as cliff-nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising. W1 c - Collaborate through the Pembrokeshire Greenways Partnership to provide and promote public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations. And W1 I - Manage recreational disturbance to species and species groups such as cliff-nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.

Project Level Action: Projects developed to address W1c, d and i should ensure that the messages, information and formats they use are accessible an easy to understand and suitable for different audiences. Consideration should be made of how information and the channels used to communicate may need

		to be tailored to reach diverse audiences, including practical engagement that explores issues and effective social media campaigns. W1c, d and i.
<p>Race</p> <p>Feedback from Gypsy and Traveller Engagement Session highlighted an interest in activities involving horses. Are there any opportunities to develop activities in this areas, perhaps directly with the Gypsy and Traveller community? Could it be linked to heritage activities as well e.g. exploring heritage of Pembrokeshire Gypsy and Travellers?</p>	+/-	<p>Response – Project Level (Collaboration): These issues would need to be addressed at project level when developing responses to W1 c “Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access</i> (2017). and H2 c -Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity. There could be opportunities to look at developing activities with horses/ grazing animals linking in with a project relating to heritage and exploring the heritage of Pembrokeshire Gypsies and Travellers.</p>

		<p>Project Level Action (Collaboration): When developing projects under W2 c and H2 c consideration of opportunities to work with others and Gypsy and Traveller Communities on joint projects relating to Heritage of Pembrokeshire Gypsies and Travellers. W2c. H2c.</p>
<p>Wording Amendment (Following June NPA)</p> <p>d) Improve water quality at designated bathing waters achieving less than “Excellent” status⁶</p> <p>i) “Collaborate to enable public access to water where appropriate for quiet enjoyment.</p>	<p>N/A</p>	<p>Removing of wording in relation to d has no additional impact on areas previously considered,</p> <p>Rewording of I has no additional impact on areas previously considered.</p>
<p>W2: Provide and promote inspiring outdoor learning and personal development opportunities for all.</p>		
<p>a) Deliver active outdoor, environmental, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).</p> <p>b) Interpret and animate cultural heritage, natural history and the arts at owned and managed sites.</p> <p>c) Offer volunteering / citizen science and formal training opportunities.</p> <p>d) Develop seasonal astrotourism activities and events, subject to guidance and adequate mitigation of any impacts e.g. on wildlife and livestock.</p>		
<p>Areas for consideration (Identified in Evidence and Feedback document) Impact</p>	<p>+/-</p>	<p>Response/ Mitigation</p>

⁶ Broad Haven Central, Little Haven, Newport North, Nolton Haven, Sandy Haven.

<p>Age / Disability / Sex</p> <p>Access to outdoor play can have positive impact on children’s physical, mental, social and emotional health and wellbeing and wider development. This is important in the context of the wider Adverse Childhood Experience Agenda.</p> <p>Boys are more likely to be physically active than girls in Wales.</p> <p>How can the Plan help facilitate opportunities for children and young people to participate in physically active activities and opportunities that could lead to longer term behavioural change? For example walks arranged by Rangers? Are there opportunities to engage with existing networks of sporting clubs and associations in the Park and surrounding area to identify gaps and barriers to participation and to see if specific project needs to be developed, including promoting and design of opportunities in terms of physical activities for girls?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p> <p><u>Consultation Response to EQIA (EqIA003 – Dyfed Archaeological Trust)</u> <u>Heritage trails/walks with children exploring historic landscapes. Generally speaking seeking out opportunities for community led excavations. Specifically to address the issue of promoting physical activity for girls - Land army days working on a farm?</u></p>	<p>+</p> <p>Response – Strategic / Project Level (Collaboration): These issues would be addressed at Project level in terms of responses to W2 a. Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).</p> <p>Project Level Action (Collaboration): Where appropriate when projects are being development and designed under impact W2 a those involved should engage with existing networks of sporting clubs and associations in the Park and surrounding area to identify gaps and barriers to participation and to see if specific project needs to be developed, including promoting and design of opportunities in terms of physical activities for girls? <u>Consider Dyfed Archaeological Trust’s suggestion of Land army days working on the</u></p>
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	<p>farm to assist with promoting physical activities for girls or similar schemes. Ensure projects also include heritage projects such as heritage trails/ walks with children exploring historic landscape. W2a.</p>
<p>Age/ Disability/ Socio Economic</p> <p>Pupils eligible for free school meals (FSM) and children in care have poorer educational outcomes in schools on average with the gap widening as pupils get older.</p> <p>Is further work needed to engage with schools with higher % of children eligible for free school meals? Are there barriers for some pupils and schools or schools in more deprived areas in terms of accessing learning opportunities in the Park (for example transport costs).?</p> <p>Non-disabled people (35%) are more likely than disabled people (18%) to get a job on the Work Programme and very few disabled people are accessing apprenticeships. Children with additional learning needs have worse educational outcomes than other children and are more likely to be excluded. This negatively impacts on future employment opportunities.</p> <p>Could provision of Work placement with organisations in the Park and other opportunities be targeted at certain groups of young people? Are there opportunities to work with schools, colleges and local businesses to address this issue? The Authority has experience in the past of providing work placements and other opportunities for young people with additional learning needs to develop skills and confidence. Could businesses in the Park be encouraged to take part in</p>	<p>+/- Response – Strategic / Project Level (Collaboration): These issues would be addressed at project level in relation to W1 c - Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the <i>Recreational Audit for Disabled Access</i> (2017). And W2 a - Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas). e - Offer volunteering / citizen science and formal training</p>

<p>the engage to change project in Wales to help 1,000 young people with learning disability and/or autism to develop their employment skills through paid work placements lasting between 6-12 months?</p> <p>Are current initiatives aimed at young people in the Park meeting the needs of young carers, is there more they could do?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>opportunities in relation to ensuring that children from schools in more deprived area gain access to learning opportunities in the Park, provision of work placements includes opportunities for people with additional learning needs and that young carers are supported through project level initiatives.</p> <p>Project Level Action: Addressing issues relating to ensuring that children from schools in more deprived area gain access to learning opportunities in the Park, provision of work placements includes opportunities for people with additional learning needs and that young carers are supported through development of projects. W1c. W2a and e.</p>
<p>Age / Disability / Gender Reassignment / Race / Religion or Belief/ Sex / Sexual Orientation</p> <p>Access to outdoor play can have positive impact on children’s physical, mental, social and emotional health and wellbeing and wider development.</p> <p>Bullying is a significant issue in learning environments and can have significant impact on children and young people’s mental well-being.</p>	<p>+/- Response – Strategic / Project Level (Collaboration): This relates to implementation of policy W2 a - Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and</p>

<p>There is a need to ensure that educational providers in the outdoors/ heritage and cultural sites have the skills necessary to deal with bullying and discriminatory language. How can the plan assist with this?</p> <p>Specific projects targeting young people who are at risk or have been bullied could assist them in developing confidence and help deal with the impact bullying has had on their well-being. Access to opportunities outside school environments to engage with young people with similar interests could be particularly beneficial or participating with work placements provided by for example rangers (activities could also assist in addressing behavior of bullies.) This could have wider impact in terms of improving mental health for young people in Pembrokeshire. How can the Plan assist with this?</p> <p>There is a need to comply with reasonable adjustment requirements under the Equality Act in relation to education settings and service provision.</p> <p>Audits should be carried out and information and best practice should be shared amongst outdoor education providers to look at how to remove barriers and provide reasonable adjustments so that young disabled people can access learning opportunities in the Park. How can the Plan assist with this?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p>	<p>events, early years provision, and a focus on young people (particularly young people in deprived urban areas) and actions would be developed at Project level</p> <p>Project Level Action: When designing, developing and delivering outdoor education and play opportunities for young people, projects should ensure that issues such as prevention and challenging of bullying and discriminatory language are built in to project design with staff provided adequate training. Could Pembrokeshire Outdoor Schools play a role in this. W2a.</p>
<p>Age</p> <p>A range of schemes are in place for schools (e.g. Eco Schools and The Global Learning Programme Wales) that are based on encouraging young people to make environmental changes to their school and wider community and become global citizens.</p>	<p>+/- Response – Strategic / Project Level (Collaboration): Potentially could be addressed at Project level through W2 a - Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson</p>

Is there potential to promote schemes like Eco Schools amongst schools in the Park and other schools the Authority and Stakeholders engage with, engage with schools in joint projects in the community or within their school related to these schemes and facilitate the sharing of best practice amongst schools in the Park engaged with these schemes? How many schools in the Park are currently engaged with these projects?

packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas). Further discussion needed with relevant PCNPA staff.

Action - Engagement PCNPA

Staff : Would promotion of schemes such as Eco Schools, The Global learning programme for Wales, would be covered by project level work under W2 a - Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas) or if explicit reference is needed. Is Pembrokeshire Outdoor Schools involved in promoting any schemes? Are they aware of the extent schools in Park are currently engaged with these schemes? **W2: a.**

Note: Plan text amended to:

	<p>“Deliver active outdoor, environmental, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and events, early years provision, and a focus on young people (particularly young people in deprived urban areas).”</p> <p>Action Community Level - Engagement (Schools in the Park and Pembrokeshire Outdoor Schools): Engage with local schools and Pembrokeshire Outdoor schools to see if they have appetite or are already involved with schemes such as Eco Schools/ The Global Learning Programme for Wales etc.? W2 a.</p>
<p>Age / Disability / Marriage and Civil Partnerships / Race / Religion and Belief / Socio Economic</p> <p>The promotion of access and positive experiences of the Park for people, families and school children in socio economic disadvantage within and outside the Park.</p> <p>Are there opportunities to link in with schemes such as family holiday initiative or schemes that can reduce transport costs? Are there opportunities to work jointly</p>	<p>+/- Response– Project Level (Collaboration): Would be addressed at Project level through both W1c and W2a.</p> <p>Action Project Level (Collaboration): When developing projects under W1c</p>

<p>with Gingerbread, local social housing and supported housing providers on joint projects? Could financial assistance be provided or scheme developed to cover travel costs for schools with high % of children on free school meals?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>and W2 a consider opportunities to link in and work collaboratively with schemes such as family holiday initiatives or schemes that can reduce transport costs will be considered. Including the development of collaborative opportunities for joint projects with organisations such as Gingerbread, local social housing and support housing providers. W1c, W2a.</p>
<p>Disability</p> <p>Disabled people are less likely to participate in leisure, arts and recreational opportunities. Barriers include inaccessible facilities or lack of appropriate facilities or equipment, transport and lack of appropriate information and awareness of what is available.</p> <p>There is a need to ensure that events and activities are designed to take into account reasonable adjustments and that wider considerations have been addressed where needed - for example location of nearest toilets, access, accessible parking, dietary requirements. How can the provision of the following be supported and increased in the Park area, working with local businesses, tourism providers and heritage sites:</p> <ul style="list-style-type: none"> • Axillary aids (beach wheelchairs, mobility scooters) and adapted recreation equipment • Facilities such as accessible toilets, changing places and provision of outdoor seats in suitable locations. This includes looking at the impact of PCC's toilet strategy on provision of toilets in the Park 	<p>+/- Please see previous responses in relation to facilities and land use planning.</p> <p>Response – Project Level (Collaboration): Would be addressed at Project level through both W1 c and k. This would include looking at access in term of outdoor recreation opportunities and access to interpretation, heritage and arts opportunities within the Park (W2b.)</p> <p>Action Project Level (Collaboration): Ensure when developing interpretation materials and projects accessibility and mechanisms to</p>

<ul style="list-style-type: none"> • Interpretation material and layout that takes into account access needs, including the provision of information for people with sensory disabilities • Participation in Autism hours or other similar schemes • Participation in Hynt, a national access scheme for theatres and artscentres in Wales, that aims to ensure a consistent offer available for disabled visitors and their carers or personal assistants • Participation in Dementia Friendly schemes • Development of schemes similar to Learning Disability Wales' Gig buddies, a befriending scheme that matches people with a learning disability and/or autism in Cardiff with volunteers who share the same interests. A Gig Buddy could be a Football Buddy, a Bowling Buddy, a Rambling Buddy, a Quiz Buddy, a Roller Skating Buddy, a Surfing Buddy. <p>Note: Theme identified in Multi-agency Equality Plan consultation activities – issue of having no one to push beach wheelchairs highlighted.</p>	<p>make them inclusive are taken into account. Consider how projects could link in or promote schemes like Hynt, Autism hour, dementia friendly attractions in the Park area or a Park specific 'Gig buddies' style scheme to help increase access to recreation opportunities in the Park area. W1c and k. W2b.</p>
<p>Sexual Orientation</p> <p>The Well-being assessment for Pembrokeshire highlighted that LGB people in Pembrokeshire would like to engage more with cultural activities.</p> <p>Alongside promoting cultural activities there is a need to ensure venues are LGBT friendly, positive visual references are viewable e.g. rainbow flag, celebrating LGBT history month, linking in with projects e.g. Iris prize and local LGBT groups.</p> <p>How could the Plan facilitate this?</p>	<p>+/- Response – Project Level (Collaboration): Would be addressed at Project level through both W1 c ensuring access to interpretation, heritage and arts opportunities within the Park highlighted through impact W2 b and H1 action a (amended).</p> <p>Action Project Level (Collaboration): Consider how culture, heritage and arts based projects and sites promoted under impact W2 b promote sites as LGBT friendly, can host specific</p>

	<p>events e.g. celebrating LGBT history month, link in with projects such as Iris Prize and work with local LGBT groups. W2b.</p>
<p>Race / Religion or Belief</p> <p>There are opportunities to use interpretation and locations in Park to share stories across cultures and foster understanding.</p> <p>For refugees and people who were not born in the UK accessing landscapes and heritage sites can often spark feelings of connections to their homeland. A community champion as part of the Mosaic project noted that ‘Some people connected some of the places in the Park to their country of birth and they felt close to their villages and home.’ and similarly when local refugee families supported through Croeso organisations visited Carew they were able to talk about their experiences of castles in Damascus, Aleppo and Homs.</p> <p>How can the Plan encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people’s relationship with the landscape and their heritage? Does reflecting on certain periods of history of the area or the impact of Flemish on local dialect provide opportunities to explore issues around community cohesion? Are there opportunities for art, cultural and heritage sites in the park to engage with Refugee Week, Black History month or community organisations working with ethnic minority groups outside the Park such as EYST?</p> <p>Are there opportunities to work with the local Gypsy and Traveller Community on events that celebrate Pembrokeshire Gypsy and Traveller heritage and provides an opportunity for this community to share their stories and history?</p>	<p>+/-</p> <p>Response – Project Level (Collaboration): This could be explored under H2 action c. However wording of action c would need to be amended to make it more inclusive so that it engages both local communities and also people visiting to reflect on their own stories and relationships with landscape.</p> <p>Action/ Amendment: Suggest amending H2 c from ‘Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity.’ to ‘Collaborate with local communities <i>and others</i> to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park and provide opportunities for people to share stories about their relationship with the landscape and their own heritage. H2c.</p> <p>Action Project Level: Consider</p>

		<p>how projects developed under H2 c can ensure that a broad perspective and interpretation of local identity can be captured and is not limited to one narrative (e.g. looking for opportunities to promote and celebrate Pembrokeshire Gypsy and Traveller heritage.) and encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people's relationship with the landscape and their heritage. H2c.</p>
<p>Age / Socio Economic</p> <p>Digital competency is part of the new national curriculum.</p> <p>How can we ensure the Park's educational and training offers provide opportunities for children to develop digital competency skills? Potential opportunities include providing education sessions that develop digital skills in data recording, mapping, analysis and in relation to creative digital skills – filming, editing etc.</p>	<p>+</p>	<p>Response – Project Level: Authority is currently reviewing its educational offer to ensure that it aligns with new curriculum including need to align with digital competency element. This would be addressed and implemented at project level in relation to W2 a. There are also potential opportunities to increase digital competency skills at project level when responding to W2 c in terms of provision of citizen science, volunteering and formal training opportunities.</p> <p>Action Project Level: When</p>

	<p>developing projects and responses to action W2 a and W2 c consider where appropriate how they can assist people in developing digital competency skills (aligning with new national curriculum.) W2a and c.</p>
<p>Age / Disability / Gender Reassignment / Marriage and Civil Partnership/ Socio Economic</p> <p>The potential of the Park in terms of its volunteering offer to assist and benefit people affected by mental ill health, social isolation, domestic abuse, physical ill health, bereavement, financial issues and homelessness.</p> <p>How can barriers to accessing volunteering and citizen science opportunities in the Park be addressed for example access to child care, transport costs, restrictions placed on people due to benefit requirements, awareness of opportunities?</p> <p>Are there opportunities to further engage with PAVS or with Pathways project officers look at potential barriers to engaging with volunteering opportunities in the Park and ways to overcome them?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/- Response – Project Level: These issues would be addressed at project level through responses to W1c and W2 c. Currently the Authority’s Pathways project looks to address issues around barriers to volunteering.</p> <p>Action Project Level: Projects and responses developed under W2c in terms of citizen science, volunteering and training opportunities should look to address potential barriers people may face to being able to access these opportunities. Projects and responses should seek to learn from existing and past projects such as Pathways and their findings and responses in relation to barriers to taking up volunteering or other opportunities. W2c.</p>
<p>Additional Issues to Consider not addressed in above sections</p>	

Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
<p>Age/ Disability/ Marriage and Civil Partnership/ Sex/ Socio Economic</p> <p>Currently there is limited reference to impact the plan could have on rural poverty beyond affordable housing, for example mechanisms assisting people and families in socio economic disadvantage in the Park area facing food and fuel poverty or affected negatively by universal credit.</p> <p>Are there opportunities to develop projects that address issues around food poverty? Learning from LEADER projects like the JIG -SO - Community Food For Thought and Bloomfield Community Centre - Narberth Community Fridge.</p> <p>Are there opportunities within the Park to develop projects addressing the issue of rural fuel poverty and which could also help reduce energy use and household CO2 emissions?</p> <p>Are there opportunities to develop joint project with farming unions, local citizens advice and also local mental health and suicide prevention organisations in terms of addressing impact of debt and financial insecurity within local communities?</p> <p>Are these issues within the scope of the Plan's remit to consider?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	+/-	<p>Response Outside Land Use Policy – Strategic Level (Rural Poverty): The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire and rural poverty is a key priority area highlighted in the plan. There are 8 integrated projects under the plan including ‘Doing things differently’ and a project on ‘Recruitment and Employment Transformation Framework’</p> <p>Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. (Well-being, enjoyment and discovery.)</p> <p>Response Outside Land Use Policy – Project Level (Food Poverty): There is potential to</p>

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develop projects that can assist with issues around Food Poverty through promoting community grown food initiatives (e.g. community gardens, allotments etc.) under N3 action a - Promote locally-produced, environmentally sound and socially responsible food (e.g. organic standard, community-grown or conservation-grade produce). and E1 m - Promote locally-produced, environmentally sound and socially responsible food (e.g. organic standard, community-grown or conservation-grade produce).

Project Level Action: Addressing issues relating to food poverty through collaborative development of projects under N3 a and E1 m in relation to community grown food initiatives (e.g. community gardens, allotments etc.) (Well-being, enjoyment and discovery.) **N3a, E1m.**

Response Land Use Planning (Fuel Poverty): These are matters that are likely to stem from strategies employed by

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housing associations or other developers. The Authority could be a contributor through land use planning advice and guidance – see above.

Action/ Amendment: No further action or amendment needed.

Response Outside Land Use Policy – Project Level (Fuel Poverty): There is potential to explore the link between light pollution and reducing fuel poverty when developing projects under L2 action b or c. In doing so there would be opportunities to explore the potential of developing joint projects with social housing providers and fuel poverty/ energy charities.

Project Level Action (Collaboration): Explore opportunities for developing projects under L2 action c and b that link light pollution reduction with approaches to reducing fuel poverty, including exploring opportunities to develop joint projects with housing associations and fuel poverty/energy charities. (L2: Action c and b. Well-being,

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enjoyment and discovery)
Response Outside Land Use Policy – Project Level (Mental Health): As mentioned in previous response, add explicit reference to mental health in relation to areas listed under W1. K. Issues relating to debt / financial insecurity and impact on mental health could be considered at project level when developing and designing responses.

Action/ Amendment: Add mental health related projects to W1. k - Collaborate in delivery of nature-based health services, including targeted walking programmes, **mental health related projects** and supporting people living with dementia." **W1k.**

Project Level Action (Collaboration): When developing projects relating to mental health consider how issues relating to debt/ financial insecurity can be addressed, linking in with relevant agencies including farming unions, fisheries bodies, citizen's advice and other

relevant organisations. **W1k.**

Equality Impact Assessment Summary

Initial considerations:

W1: Impacts relating to - barriers for particular groups in terms of access to recreation or well-being initiatives. Addressing representation, communication channels used and accessibility and nature of information provided in terms of destination promotion and messages aimed at managing recreational conflict. Positive public health impacts in terms of promotion of access to outdoors and bathing water quality. Promoting Dementia Friendly Communities. Mental health considerations including – young people, expectant and new mums and suicide prevention activities. Addressing social isolation. Impacts in relation to barriers to accessing and using active travel and public transport for some groups. Impact of harassment and hate crime. Use of beaches and other sites by religious and faith groups. Ensuring interventions to manage pressure point locations do not disadvantage protected groups.

W2: Impacts relating to - Access to inclusive and accessible outdoor play opportunities. Addressing barriers to participation in volunteering, events and activity opportunities for some groups. Work placements opportunities for people with additional learning needs. Addressing needs of young carers. Removing barriers and increasing access to arts and heritage opportunities within the Park for some groups. Opportunities to use interpretation and locations in Park to share stories across cultures and foster understanding. Use of opportunities to develop digital competency skills for young people.

Additional considerations: Addressing issues relating to rural poverty including food and fuel poverty, impacts of universal credit and debt on rural and coastal communities

Protecting and restoring biodiversity

E1: Protect and improve biodiversity quality, extent and connectivity at scale.*

- a) Maintain and extend delivery of locally tailored agri-environment assistance (including advice, capital grants, management agreements, help with grazing, access to volunteers, conservation covenants) in support of biodiversity restoration (e.g. hay meadows, marshy grassland, hedges and stream corridors), including designated nature conservation sites and other high nature value sites.
- b) Conserve and restore semi-natural woodland, wood pasture, trees in the landscape and field boundaries, taking into account species' connectivity needs, landscape and the impacts of plant pathogens e.g. *Chalara* ash dieback, [and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape.](#)
- c) Manage and monitor invasive non-native and /or harmful species in partnership with local communities, with specific reference to Japanese knotweed, Himalayan balsam and *Rhododendron* in the Gwaun, Porthgain, Clydach and Castlemartin catchments.
- d) Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policies and supplementary planning guidance on biodiversity.
- e) Support the Pembrokeshire Wildfire Group and relevant stakeholders to manage and mitigate wildfire risks.
- f) Contribute to delivery of the B-lines Network in Pembrokeshire, and to conservation and enhancement of the Bumblebee Conservation Trust priority sites.
- g) Manage lighting for vulnerable species and species groups including bats, otter, dormouse, Manx shearwater (vulnerable also to ships' lighting) and invertebrates.
- h) Implement the management schemes for Pembrokeshire Marine Special Area of Conservation, Carmarthen Bay and Estuaries European Marine Sites and Cardigan Bay Special Area of Conservation (priority actions include awareness-raising, sustainable management of living resources such as bait and seaweed, marine litter and marine invasive species monitoring), supporting management of neighbouring marine Special Protection Areas as appropriate and collaborating in delivery of Marine Protected Area Network Management Action Plans.
- i) Collaborate on marine pollution prevention, contingency planning and response.
- j) Acquire or lease sites of actual or potential nature value where this is a cost- effective management option.
- k) Interpret and animate cultural heritage, natural history and the arts [at owned and managed sites.](#)
- l) Promote locally-produced, environmentally sound and socially responsible food (e.g. organic standard, community-grown or conservation-grade produce).
- m) Manage recreational disturbance to species and species groups such as cliff-nesting birds and marine mammals through codes of conduct, restrictions and awareness-raising.

- n) Undertake particular measures to conserve species for which Pembrokeshire is uniquely important (e.g. Southern damselfly, a feature of the Preseli Special Area of Conservation).
- o) Support local delivery of the Welsh Government's proposed [Sustainable Farming Scheme](#). ~~Public Goods scheme.~~
- o)p) [Collaborate in delivery of projects arising from the Pembrokeshire Well-being Plan, e.g. Environmental and Climate Change Risk Assessment.](#)
- p)q) Resist proposals which have a likely significant [adverse](#) effect (either alone or in combination with other plans and projects) upon a European site unless it can be ascertained following an appropriate assessment that they will have no significant adverse effect on the integrity of the site(s) concerned.
- q)r) Monitor wildlife crime [and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.](#)

Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
<p>Age / Disability / Race / Sex</p> <p>Is the information we provide visitors and people living locally aimed at preventing recreational disturbances or encouraging certain behavior (e.g. around wildlife, lighting fires, walking with dogs, drones) suitable and accessible for residents and the diverse and wide range of visitors to the Park.</p> <p>How can the plan ensure that messages and information reaches different audiences and in a format that they can access and understand? Taking into account the use of plain English, accessible formats, use of pictures and meeting the needs of people whose first language is not English or Welsh, using digital channels to engage with some groups and where we provide information. How can interactive activities be developed to help people learn in practice how to engage with outdoors without causing harm, this could be particularly beneficial for people with limited experience of the countryside or who struggle with written information?</p> <p>Are there opportunities to work with existing online networks to launch joint social</p>	+/-	<p>Response Outside Land Use Policy – Project Level: These issues would need to be addressed at project level when developing responses to E1 action e and m.</p> <p>Project Level Action: Projects developed to address E1 action e and m, should ensure that the messages, information and formats they use are accessible an easy to understand and suitable for different audiences. Consideration should be made of how information and the channels used to communicate may need to be tailored to reach diverse audiences, including practical engagement that explores issues</p>

<p>action campaigns? Important to ensure online engagement and spaces are safe environments for people.</p> <p>Role of digital connectivity in Park not highlighted in Plan. Issue needs to be considered due to link with information, engagement and service provision</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>and effective social media campaigns. E1e and m.</p>
<p>Age</p> <p>To help support delivery of impact identified in this policy area it is important that people have the necessary digital skills that could assist with delivery.</p> <p>For example skills around data collection, use of digital mapping and analysis tools that may positively impact on areas around biodiversity/ carbon reduction and offsetting in agriculture (Current example the PLANED BRICS project - http://www.planed.org.uk/brics/).</p> <p>What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to industries such as agriculture, fisheries and forestry.?</p> <p>How could the plan support the development of skills in this area? Are there opportunities to work with Pembrokeshire College, Universities, farming unions, PLANED and others to explore this?</p> <p>Would support and action in any of the above areas fall within the scope of the plan?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/-</p> <p>Response Outside Land Use Policy –Strategic Level: The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan includes ‘Recruitment and Employment Transformation Framework’, initiatives under this project should have a positive impact on employment opportunities for young people and others in the Park.</p> <p>Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing</p>

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communities within the Park area. **E1.**

Action Strategic Level – Engagement (Collaboration):

Topic to consider for strategic group: What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to industries such as agriculture, fisheries and forestry? How could the Plan support the development of skills in this area? Are there opportunities to work with Pembrokeshire College, Universities, farming unions, PLANED and others to explore this? Would support and action in any of the above areas fall within the scope of the plan? **E1.**

Response Outside Land Use Policy – Project Level: Authority is currently reviewing its educational offer to ensure that it aligns with new curriculum including need to align with digital competency element. This would be addressed and implemented at project level in relation to W2 a. There are also potential

	<p>opportunities to increase digital competency skills at project level when responding to W2 c in terms of provision of citizen science, volunteering and formal training opportunities.</p> <p>Action Project Level: When developing projects and responses to action W2 a and W2 c consider where appropriate how they can assist people in developing digital competency skills (aligning with new national curriculum.) E1.</p>
<p>Age / Disability/ Marriage and Civil Partnerships/ Sex / Socio Economic</p> <p>Promoting community grown food through community allotments and similar projects could assist people and families in socio economic disadvantage in the Park area facing food poverty.</p> <p>Are there opportunities to work jointly with local social housing and supported housing providers, PAVS, Clynfyw Care Farm, local food banks and community organisations on joint projects?</p>	<p>+</p> <p>Response Outside Land Use Policy – Project Level (Food Poverty): There is potential to develop projects that can assist with issues around Food Poverty through promoting community grown food initiatives (e.g. community gardens, allotments etc.) under E1 action m and N3 action a.</p> <p>Project Level Action: Address issues relating to food poverty through collaborative development of projects under N3 a and E1 m in relation to community grown food initiatives</p>

	<p>(e.g. community gardens, allotments etc.) Potential to engage with existing projects and work with local social housing and supported housing providers, PAVS, Clynfyw Care Farm, local food banks and community organisations on joint projects. E1m, N3a.</p>
<p>Age/ Disability</p> <p>When carrying out interventions related to marine pollution prevention it is important to consider how messages or action encouraged may impact on people from different groups. For example banning of plastic straws or promotion of plastic free locations. In the case of campaigns on plastic straws, initial discussion did not recognize potential impact of ban on disabled people. Potential solution identified by disabled people and advocates was that restaurants and coffee shops could keep plastic straws on hand for disabled people and people with health needs that require use of one. When designing water fountains it is important to consider are they placed in accessible locations, is there design accessibility– e.g. could someone in a wheelchair use them, are the instructions easy to follow? Have recycling bins been positioned in an accessible manner?</p> <p>How can the Plan encourage people developing interventions or schemes to consider how such schemes might impact different groups, particularly disabled people?</p>	<p>+/- Response Outside Land Use Policy – Project Level: In terms of interventions and responses under E1 action i, individual proposals will need to consider equality impacts.</p> <p>Project Level Action: Individual Proposals and responses under E1 action i used to address issues relating to marine litter and associated issues will need to consider equality impacts to ensure they do not unfairly disadvantage or discriminate against disabled people and can put in place mitigating actions where needed. This includes thinking about how initiatives can make it easier and remove barriers for disabled people so that they are able to benefit from opportunities to assist with issues</p>

		around marine litter (e.g. location of recycling bins, design of water fountains). E1i.
<p>Disability/ Race</p> <p>When interpreting and animating cultural heritage, natural history and the arts at owned and managed sites there is a need to take into account the accessibility of interpretation material and its layout so that it meets the needs of people with access needs including those with sensory disabilities and also for visitors who do not have English or Welsh as their first language. How can the Plan help ensure this happens?</p>	+/-	<p>Response Outside Land Use Policy – Project Level: This would be addressed at project level under E1 action k in relation to how Authority and partners develop interpretation material. There is potential to link action k with W1 action c in terms of exploring responses to removing barriers to people being able to access opportunities in the Park.</p> <p>Project Level Action: When developing and designing interpretation material and layout under E1 action k, consideration should be taken of how these can be made accessible, (particularly for disabled people with different sorts of disabilities) and be relevant and engaging for diverse audiences. E1k.</p>
<p>Age / Disability/ Gender Reassignment / Pregnancy and Maternity / Race/ Religion or Belief/ Sex / Sexual Orientation</p> <p>Across the protected characteristics there are issues relating to people being targeted for harassment, sexual violence, domestic abuse and hate crime and</p>	+/-	<p>Response Outside Land Use Policy – Project Level: Recognise that when projects in place to manage lighting / light pollution in Park Area there is a need to factor in potential safety</p>

<p>incidents. Fear of being targeted may also mean people are reluctant to go outdoors and use public transport. This is an issue that is relevant for those living in the Park and also those visiting it. Younger People aged 16-24 are the age group in Wales who feel least safe walking in their local area after dark. Dark sky / light pollution measures in an area including limited street light provision could increase the risks for some individuals and make them more vulnerable to incidents or discourage them from going out in the dark in certain areas (which could be particularly restrictive in winter time).</p> <p>How will actions to manage lighting for vulnerable species and species groups including bats, otter, dormouse, Manx shearwater and invertebrates take into account wider potential security concerns within an area?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p>		<p>implications or concerns that people may perceive or face.</p> <p>Project Level Action: Projects focusing on light pollution/ minimisation should consider at design and development stage secure by design principles and potential safety implications of projects and identify mechanism for concerns and issues to be mitigated. Consideration should be taken of impacts on both residents and visitors with a recognition that safety concerns could act as a barrier for some people to accessing the Park or local services/ public transport opportunities particularly in winter months. E1g.</p>
<p>Age/ Disability/ Pregnancy and Maternity / Sex</p> <p>Impacts within this policy should have positive impact on public health considerations.</p>	+	<p>Response Outside Land Use Policy – Project Level: Actions under E1 should have positive impact on public health particularly those that impact on Marine pollution and food.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Additional Issues to Consider not addressed in above sections</p>		
<p>Areas for consideration (Identified in Evidence and Feedback document)</p>	+/-	<p>Response/ Mitigation</p>

and Impact			
Equality Impact Assessment Summary			
<p>Initial considerations:</p> <p><i>E1: Impacts relating to - Addressing communication channels used and accessibility and nature of information provided in terms of preventing recreational disturbances or encouraging certain behavior. Addressing current and future digital skills gaps that could help deliver impacts. Joint working opportunities and positive impact of promotion of community grown food. Ensuring interventions on marine pollution are inclusive and take account of accessibility needs. Light restriction and impact on perceived and actual security in area. Positive impacts on public health. Developing inclusive and accessible interpretation at sites.</i></p>			

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Celebrating Heritage

H1: Conserve and enhance landscapes of particular historic interest, [Conservation Areas](#), scheduled monuments, listed buildings and their settings.

- a. Raise public awareness and enjoyment of historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation.
- b. Monitor the condition of scheduled monuments and sites of local [heritage](#) significance.
- c. Target management (including agri-environment scheme assistance) to stabilise monuments in worsening condition, prioritising according to monument condition and the nature of risk, with recording and rescue excavation, as appropriate, for sites at risk of coastal erosion.
- d. Conserve and restore field boundaries with a particular emphasis on areas of registered historic landscapes and relevance to connectivity for biodiversity.
- e. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* heritage policies and associated guidance (e.g. updates to conservation area proposals documents, including review of tree preservation orders).
- f. Conserve and enhance conservation areas and historic buildings, including listed buildings and buildings at risk, through advice, grants and enforcement.
- g. Conserve local distinctiveness in the built environment.
- h. Celebrate place names, e.g. field names.
- i. Monitor heritage crime [and liaise with crime prevention agencies to ensure that where it arises appropriate action is taken.](#)

Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
<p>Age / Disability / Race / Sex</p> <p>Is the information we provide visitors and people living locally to raise public awareness and enjoyment of historic landscapes, buildings and monuments, suitable and accessible for residents and the diverse and wide range of visitors to the Park. How can the plan ensure that messages and information reaches different audiences and in a format that they can access and understand? Taking into account the use of plain English, accessible formats, use of pictures and</p>	+/-	<p>Response Outside Land Use Policy – Strategic Level /Project Level: This in part would be addressed through amendment suggested for W1 around ‘the promotion of the National Park as a destination reaches and is representative of more diverse audiences and projects develop in</p>

meeting the needs of people whose first language is not English or Welsh, using digital channels to engage with some groups and where we provide information.

Representation is a major barrier for ethnic minorities and other groups which feel excluded from the National Parks. The Champions in the Mosaic projects, clearly articulated that when websites and other communications fail to include images of ethnic minority people, it conveys a message that the National Parks are “not for people like me”. **Are there opportunities to make destination promotion of the Park heritage sites more inclusive? Are there opportunities to develop campaigns that through increasing user generated content of images of diverse people (themselves, friends, families) in the Park (and other Parks in the UK) help increase representation, visibility and reach of the destination through people’s own online and social networks?**

How can we ensure information about the Park’s heritage opportunities are promoted in more urban areas, community hubs and urban events such as Mela’s and Pride to enable destination promotion to reach wider audiences?

[Note: Theme identified in Multi-agency Equality Plan consultation activities.](#)

response. However adding ‘and increase access to’ in H1 a “Raise public awareness and enjoyment of historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation” would make it clear that initiatives to increase access and reach diverse audiences also apply to historic, heritage and cultural opportunities in the Park, not only outdoor recreational aspects.

Action - Amendment: Amend the following “Raise public awareness and enjoyment of historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation.” To “Raise public awareness and enjoyment of *and increase access to* historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation.” **H1a.**

Project Level Action: Develop

	<p>projects that support the promotion of the Park's heritage and cultural sites as a destination to more diverse audiences and that its portrayal of these sites as a destination is more representative as a result of amendments to H1 action a and amendments around destination promotion in W1. W1. H1a.</p>
<p>Disability</p> <p>Disabled people are less likely to participate in leisure, arts and recreational opportunities. Barriers include inaccessible facilities or lack of appropriate facilities or equipment, transport and lack of appropriate information and awareness of what is available.</p> <p>There is a need to ensure that heritage events, activities and volunteering opportunities are designed to take into account reasonable adjustments and that wider considerations have been addressed where needed - for example location of nearest toilets, access, accessible parking, dietary requirements. How can the provision of the following be supported and increased in the Park area, working with local businesses, tourism providers and heritage sites:</p> <ul style="list-style-type: none"> • Axillary aids (mobility scooters) • Facilities such as accessible toilets, changing places and provision of outdoor seats in suitable locations. • Interpretation material and layout that takes into account access needs, including the provision of information for people with sensory disabilities • Virtual and other visual tools that enable people who cannot physically access certain parts of a heritage site for example towers within a castle to gain a 	<p>+/- Please see previous responses in relation to facilities and land use planning.</p> <p>Response Outside Land Use Policy – Project Level (Collaboration): Would be addressed at Project level through both W1 c, k and following amendment H1 action a. This would include looking at access in term of access to interpretation, heritage and arts opportunities within the Park.</p> <p>Action Project Level (Collaboration): Ensure when developing interpretation materials and projects accessibility and mechanisms to make them inclusive are taken into account. Consider how projects could link in or promote</p>

<p>virtual insight and experience of those parts of the heritage site.</p> <ul style="list-style-type: none"> • Participation in Autism hours or other similar schemes • Participation in Hynt, a national access scheme for theatres and arts centres in Wales, that aims to ensure a consistent offer available for disabled visitors and their carers or personal assistants • Participation in Dementia Friendly schemes • Development of schemes similar to Learning Disability Wales' Gig buddies, a befriending scheme that matches people with a learning disability and/or autism in Cardiff with volunteers who share the same interests. A Gig Buddy could be a Football Buddy, a Bowling Buddy, a Rambling Buddy, a Quiz Buddy, a Roller Skating Buddy, a Surfing Buddy. <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p> <p><u>Consultation Response to EQIA (EqIA002 – Dyfed Archaeological Trust)</u></p> <p><u>Opportunities for less mobile members of a community to engage with the historic environment/cultural heritage. One way of achieving this could be travelling 'road shows' bringing teaching collections to adults with dementia or mobility issues. Engaging all members of communities promoting inclusivity and the historic environment.</u></p>	<p>schemes like Hynt, Autism hour, dementia friendly attractions in the Park area or a Park specific 'Gig buddies' style scheme to help increase access to recreation opportunities in the Park area. <u>Consider development of travelling 'road shows' to bring teaching collections to adults with dementia or mobility issues. W1c and k, H1a (amended).</u></p>
<p>Sexual Orientation</p> <p>The Well-being assessment for Pembrokeshire highlighted that LGB people in Pembrokeshire would like to engage more with cultural activities.</p> <p>Alongside promoting cultural activities there is a need to ensure venues are LGBT friendly, positive visual references are viewable e.g rainbow flag, celebrating LGBT history month, linking in with projects e.g. Iris prize and local LGBT groups.</p>	<p>+/- Response Outside Land Use Policy – Project Level (Collaboration): Would be addressed at project level through both W1 c and H1 action a (amended).</p> <p>Action Project Level</p>

<p>How could the Plan facilitate this?</p>	<p>(Collaboration): Consider how culture, heritage and arts based projects and sites promoted under H1 action a (amended) in order to Raise public awareness and enjoyment of historic landscapes, buildings and monuments can host specific events e.g. celebrating LGBT history month, link in with projects such as Iris Prize and work with local LGBT groups and promote sites as LGBT friendly. W1c, H1a (amended).</p>
<p>Age/ Race / Religion or Belief</p> <p>There are opportunities to use interpretation and locations in Park to share stories across cultures and foster understanding.</p> <p>For refugees and people who were not born in the UK accessing landscapes and heritage sites can often spark feelings of connections to their homeland. A community champion as part of the Mosaic project noted that ‘Some people connected some of the places in the Park to their country of birth and they felt close to their villages and home.’ and similarly when local refugee families supported through Croeso organisations visited Carew they were able to talk about their experiences of castles in Damascus, Aleppo and Homs.</p> <p>The sharing of stories can also be an important tool for intergenerational community engagement.</p> <p>How can the Plan encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people’s relationship with the</p>	<p>+/- Response– Project Level (Collaboration): This could be explored under H2 action c. However wording of action c would need to be amended to make it more inclusive so that it engages both local communities and also people visiting to reflect on their own stories and relationships with landscape.</p> <p>Action/ Amendment: Suggest amending H2 b from ‘Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity.’ to ‘Collaborate with local</p>

<p>landscape and their heritage? Does reflecting on certain periods of history of the area or the impact of Flemish on local dialect provide opportunities to explore issues around community cohesion? Are there opportunities for art, cultural and heritage sites in the park to engage with Refugee Week, Black History month or community organisations working with ethnic minority groups outside the Park such as EYST?</p> <p>Are there opportunities to work with the local Gypsy and Traveller Community on events that celebrate Pembrokeshire Gypsy and Traveller heritage and provides an opportunity for this community to share their stories and history?</p>	<p>communities <i>and others</i> to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park <i>and provide opportunities for people to share stories about their relationship with the landscape and their own heritage.</i> (Amendment applied.)</p> <p>Action Project Level: Consider how projects developed under H2 c can ensure that a broad perspective and interpretation of local identity can be captured and is not limited to one narrative (e.g. looking for opportunities to promote and celebrate Pembrokeshire Gypsy and Traveller heritage.) and encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people’s relationship with the landscape and their heritage. H2b.</p>
<p>Age/ Disability/ Gender Reassignment/ Marriage and Civil Partnerships / Race / Religion or Belief / Sex / Sexual Orientation</p> <p>The need to help support and develop community focal points/ facilities, hubs, locations for events and activities that help address social isolation and provide</p>	<p>+/- Response – Strategic Level/ Project level: The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services Board who are</p>

opportunities for people to engage with others in the Park area. A need to ensure that these facilities are inclusive and accessible.

There is potential for some heritage sites particularly those with facilities (cafes/meeting rooms) to become community focal points. What actions could the plan promote that could assist with this?

Note: Theme identified in Multi-agency Equality Plan consultation activities.

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implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan including 'Doing things differently' which includes looking at how facilities and services are delivered to communities and how to respond to new challenges. Currently Oriel y Parc provides a meeting point for Dementia Café and other groups in the Park and Castell Henllys and Carew provide fairs and community focused events that provide opportunities for people to engage with others.

Action/ Amendment: Include more explicit reference to Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. H1.

Project Level Action: Continue to support delivery of community focused events and fairs at

		heritage and cultural centres within the Park under H1 a (amended). H1a.
<p>Age / Disability / Marriage and Civil Partnerships / Race / Religion and Belief / Socio Economic</p> <p>The promotion of access and positive experiences of heritage opportunities in the Park for people, families and school children in socio economic disadvantage within and outside the Park.</p> <p>Are there opportunities to link in with schemes such as family holiday initiative or schemes that can reduce transport costs? Are there opportunities to work jointly with Gingerbread, local social housing and supported housing providers on joint projects? Could financial assistance be provided or scheme developed to cover travel costs for schools with high % of children on free school meals?</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	+/-	<p>Response – Project Level (Collaboration): Would be addressed at Project level through both W1 c, W2 a and H1 a (amended).</p> <p>Action Project Level (Collaboration): When developing projects under W1c and W2 opportunities to link in and work collaboratively with schemes such as family holiday initiatives or schemes that can reduce transport costs will be considered (this includes enabling people to access heritage and cultural opportunities within the Park). Including the development of collaborative opportunities for joint projects with organisations such as Gingerbread, local social housing and support housing providers. W1c, W2a, H1a (amended).</p>
<p>Age / Disability / Gender Reassignment / Marriage and Civil Partnership/ Socio Economic</p>	+/-	<p>Response– Project Level: These issues would be addressed at project level through responses to W1c and W2 c. Currently the</p>

<p>The potential of the Park in terms of its volunteering offer to assist and benefit people affected by mental ill health, social isolation, domestic abuse, physical ill health, bereavement, financial issues and homelessness.</p> <p>How can barriers to accessing volunteering opportunities in the Park be addressed for example access to child care, transport costs, restrictions placed on people due to benefit requirements, awareness of opportunities?</p> <p>Are there opportunities to further engage with PAVS or with Pathways project officers look at potential barriers to engaging with volunteering opportunities in the Park and ways to overcome them?</p>		<p>Authority's Pathways project looks to address issues around barriers to volunteering.</p> <p>Action Project Level: Projects and responses developed under W2c and H1 a in terms of citizen science and volunteering should look to address potential barriers people may face to being able to access these opportunities. Projects and responses should seek to learn from existing and past projects such as Pathways and their findings and responses in relation to barriers to taking up volunteering or other opportunities. W2c, H1a.</p>
<p>Religion and Belief</p> <p>Impacts within this policy should have positive impact on heritage sites of religious importance within the Park.</p>	+	<p>Response – Project Level: Actions under H1 should positively impact on heritage sites of religious importance within the Park.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Age / Disability</p> <p>Are there any current issues in relation to access and conservation areas and historic buildings in the Park? How are issues relating to accessible and lifetime</p>	?	<p>Response Land Use Planning (Historic Buildings/ Conservation Areas): Further</p>

<p>neighbourhoods addressed within conservation areas?</p>		<p>information needed.</p> <p>Action – Engagement PCNPA staff: Are there any current issues in relation to access and conservation areas and historic buildings in the Park? How are issues relating to accessible and lifetime neighbourhoods addressed within conservation areas? H1.</p>
<p>H2: Promote the Welsh language and local dialects and celebrate culture and creativity related to the landscape.</p>		
<p>a. Interpret and animate landscape, cultural heritage, natural history and the arts <u>at owned and managed sites</u>.</p> <p>b. Contribute to the target⁷ for the number of people able to enjoy speaking and using Welsh to reach a million by 2050.</p> <p>a. Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity <u>in the Park and provide opportunities for people to share stories about their relationship with the landscape and their own heritage</u>.</p> <p>c. Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings.</p> <p>d. Collaborate in delivery of projects arising from the <i>Pembrokeshire Well-being Plan</i>, e.g. Community Participation.</p>		
<p>Areas for consideration (Identified in Evidence and Feedback document) and Impact</p>	<p>+/-</p>	<p>Response/ Mitigation</p>
<p>Disability/ Race</p> <p>When interpreting and animating cultural heritage, natural history and the arts at owned and managed sites there is a need to take into account the accessibility of interpretation material and its layout so that it meets the needs of people with access needs including those with sensory disabilities and also for visitors who do not have English or Welsh as their first language. How can the Plan help ensure this happens?</p>	<p>+/-</p>	<p>Response Outside Land Use Policy – Project Level: This would be addressed at project level under H2 action in relation to how Authority and partners develop interpretation material. There is potential to link action a with W1 action c in terms of</p>

⁷ Cymraeg 2050

	<p>exploring responses to removing barriers to people being able to access opportunities in the Park.</p> <p>Project Level Action: When developing and designing interpretation material and layout under H2 action a, consideration should be taken of how these can be made accessible, (particularly for disabled people with different sorts of disabilities) and be relevant and engaging for diverse audiences. H2a.</p>
<p>Sexual Orientation</p> <p>The Well-being assessment for Pembrokeshire highlighted that LGB people in Pembrokeshire would like to engage more with cultural activities.</p> <p>Alongside promoting cultural activities there is a need to ensure venues are LGBT friendly, positive visual references are viewable e.g. rainbow flag, celebrating LGBT history month, linking in with projects e.g. Iris prize and local LGBT groups.</p> <p>How could the plan facilitate this?</p>	<p>+/- Response Outside Land Use Policy – Project Level (Collaboration): Would be addressed at project level through both W1 c and H1 action a (amended), and H1 action c.</p> <p>Action Project Level (Collaboration): Consider how culture, heritage, story-telling and arts based projects and sites promoted under H1 action a (amended) and H2 c can host specific events e.g. celebrating LGBT history month (and Pembrokeshire based LGBT History), link in with projects such as Iris Prize and work with local</p>

	LGBT groups and promote sites as LGBT friendly. W1c, H1a (amended), H2c.
<p>Age / Race / Religion or Belief</p> <p>There are opportunities to use interpretation and locations in Park to share stories across cultures and foster understanding.</p> <p>For refugees and people who were not born in the UK accessing landscapes and heritage sites can often spark feelings of connections to their homeland. A community champion as part of the Mosaic project noted that ‘Some people connected some of the places in the Park to their country of birth and they felt close to their villages and home.’ and similarly when local refugee families supported through Croeso organisations visited Carew they were able to talk about their experiences of castles in Damascus, Aleppo and Homs.</p> <p>The sharing of stories can also be an important tool for intergenerational community engagement and for those with dementia.</p> <p>How can the Plan encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people’s relationship with the landscape and their heritage? Does reflecting on certain periods of history of the area or the impact of Flemish on local dialect provide opportunities to explore issues around community cohesion? Are there opportunities for art, cultural and heritage sites in the park to engage with Refugee Week, Black History month or community organisations working with ethnic minority groups outside the Park such as EYST?</p> <p>Are there opportunities to work with the local Gypsy and Traveller Community on events that celebrate Pembrokeshire Gypsy and Traveller heritage and provides an opportunity for this community to share their stories and history?</p>	<p>+/- Response Outside Land Use Policy – Project Level (Collaboration): This could be explored under H2 action c. However wording of action c would need to be amended to make it more inclusive so that it engages both local communities and also people visiting to reflect on their own stories and relationships with landscape.</p> <p>Action/ Amendment: Suggest amending H2 c from ‘Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity.’ to ‘Collaborate with local communities <i>and others</i> to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park <i>and provide opportunities for people to share stories about their relationship with the landscape and their own heritage.</i> H2c.</p> <p>Action Project Level: Consider</p>

	<p>how projects developed under H2 c can ensure that a broad perspective and interpretation of local identity can be captured and is not limited to one narrative (e.g. looking for opportunities to promote and celebrate Pembrokeshire Gypsy and Traveller heritage.) and encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people's relationship with the landscape and their heritage. H2c.</p>
<p>Age / Disability/ Pregnancy and Maternity / Sex</p> <p>Provision of Welsh language events and opportunities to learn and use Welsh while engaging in projects to assist or find out more about the Park can assist with social isolation issues for particular groups. How can the plan, facilitate more opportunities like this?</p> <p><u>Note: Linked to theme identified in Multi-agency Equality Plan consultation activities. Some feedback noted that they felt people without Welsh Language Skills were disadvantaged in terms of work opportunities. Potential for projects related to the Park to assist people to learn and develop their use of the Welsh Language.</u></p> <p>Community focal points and facilities can play an important role in addressing</p>	<p>+</p> <p>Response – Project Level (Collaboration): Would be addressed at project level through both H2 action b and c linking with project developed under W1 action c and k.</p> <p>Project Level Action: Development of responses under W1 c and k should consider how Welsh language could be used to develop projects that enable people to find out more about the park while also addressing social isolation issues. Development of responses in relation to H2 action b and c should consider how</p>

<p>social isolation and providing opportunities for people to engage with others in the Park area. Are there opportunities to learn from Tafarn y Sinc in terms of opportunities to develop community focal points that can both support community resilience and engagement while also helping promote the welsh language and heritage? How could the plan foster such activities?</p>	<p>Welsh Language projects can help address issues around social isolation and loneliness and bring people together and opportunities to work with communities to develop Welsh language community hubs / focal points. W1c and k, H2b and c.</p>
<p>Religion and Belief</p> <p>The National Park area contains a number of historic religious buildings and sites of importance both locally and in terms of pilgrimage for those visiting outside of area. Heritage sites/ ancient monument in the Park can be the focal point of religious celebrations. There can be issues relating to intentional damage at sites. Authority and Dyfed Powys Police have worked with pagan community through heritage watch to provide guidance sympathetic enjoyment of monuments considered sacred and their settings. It is positive that this has been included as an impact in the plan.</p> <p>Does any further engagement need to be carried out with communities to ensure guidance and positive relations are maintained?</p> <p><u>Consultation Response to EQIA (EqIA002 – Dyfed Archaeological Trust)</u> <u>Many opportunities for supporting policies on religion and belief as many historic monuments are ‘sacred’ in nature. A more ‘open door’ approach providing access to certain sites at certain times.</u></p>	<p>+</p> <p>Response - Policy/ Project Level: Addressed through H2 action d - Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings.’ and policy level responses under this.</p> <p>Project Level Action - Engagement: In developing projects in response to this continuous engagement will be needed with communities to ensure guidance and positive relations are maintained. This could be done through Heritage Watch Scheme <u>and exploring options around having a more ‘open door’ approach providing access to certain sites at certain times.</u> H2d.</p>
<p>Additional Issues to Consider not addressed in above sections</p>	

Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
Equality Impact Assessment Summary		
<p>Initial Considerations:</p> <p>H1: Impacts relating to - Addressing representation, communication channels used and accessibility of information used to promote opportunities. Removing barriers and increasing access to arts and heritage opportunities within the Park for some groups. Opportunities to use interpretation and locations in Park to share stories across cultures and foster understanding. Use of heritage sites as community focal points. Impacts within this policy should have positive impact on heritage sites of religious importance within the Park. Addressing barriers to participation in volunteering, events and activity opportunities for some groups. Conservation areas and access considerations.</p> <p>H2: Impacts relating to - Developing inclusive and accessible interpretation at sites. Increasing access for particular groups to participate in cultural activities. Opportunities to use interpretation and locations in Park to share stories across cultures and foster understanding. Use of community based welsh language initiatives to address social isolation. Positive impact re guidance on sympathetic enjoyment as sites in park used for religious and faith pilgrimage and celebrations.</p>		

Managing natural resources sustainably

N1: Contribute to a low carbon economy for Wales and adapt to climate change.*		
<p>a) Collaborate in delivery of actions in <i>Prosperity for All: a Low Carbon Wales</i> including a carbon neutral by 2030, implementing renewable energy and energy efficiency measures (see N1b), reducing transport emissions reductions (see N1d) and safeguarding and increasing carbon storage (see N3b) including agricultural soils.</p> <p>a. Manage development in accordance with Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> policies and guidance in relation to soil, water, air and earth heritage, support for appropriate renewable energy development and energy efficiency measures, flooding and coastal inundation, development in coastal change management areas, relocation of development affected by coastal change, sustainable design and drainage and waste, supported by supplementary planning guidance where needed, and promoting waste efficiency through the waste hierarchy <u>and by raising awareness of circular economy principles.</u></p> <p>a. <u>Collaborate in delivery of projects arising from the Pembrokeshire Well-being Plan, e.g. Becoming a Carbon-neutral County.</u></p> <p>b) Collaborate on coastal adaptation schemes e.g. Newgale.</p> <p>c) Collaborate through the Pembrokeshire Greenways Partnership to provide and promote public transport, active travel and low-carbon vehicle initiatives.</p>		
Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
<p>Age/ Disability/ Pregnancy and Maternity/ Sex</p> <p>A need to remove barriers in neighbourhoods that prevent accessible active transport routes – link with issue of promoting accessible and dementia friendly neighbourhoods. This includes ensuring interventions developed for pressure point locations do not impact on the accessibility of routes or mean that a disabled person is now unable to access a location due to for example accessible parking bays no longer being available.</p> <p>Are there opportunities to engage with users to develop interactive maps of their neighbourhoods e.g. information on drop curbs etc., resting facilities like benches or where toilet and changing facilities are available? Are people with mobility and</p>	+/-	<p>Response - Land Use Policy: Look at viability of this being addressed through our revision of the Parking Standards SPG.</p> <p>Action – Engagement PCNPA: Seek further guidance in relation to revision of Parking Standards SPG (accessibility). N1 d.</p> <p>Response: Propose amendment to wording of N1 d 3 to reference accessible in wording. This will</p>

other needs able to access drop of and pick up points for public transport easily in the Park?

There is a need to work with greenways, public transport providers, community transport and local taxi firms to improve the accessible transport offer. It is important the plan promotes innovation in this area due to the Park's location and current public transport offer, e.g. helping local taxi firms increase their accessible car fleet while greening their fleet, developing apps to help plan accessible journeys and look at how on demand apps could be used in rural setting. How will the plan foster the development of innovative accessible transport solutions?

How will the plan ensure that low carbon vehicle initiatives such as electric charging points take into account needs of disabled car users and address issues of accessibility or assistance in their design?

Note: Theme identified in Multi-agency Equality Plan consultation activities.

assist in development of projects that take account of accessibility considerations in terms of both provision and promotion of public transport, active travel and low-carbon vehicle initiatives.

Action/ Amendment: Add accessible to N1 action d "to provide and promote accessible public transport, active travel and low carbon- vehicle initiatives. N1d.

Response– Project Level
(Collaboration): Recognise that there is a need for projects and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park to consider accessibility and how to overcome barriers particular users may face in terms of both access to information and accessing/ using transport options.

Project Level Action
(Collaboration): Projects focusing on and forums addressing issues relating to public transport, active travel and

	<p>low-carbon vehicle initiatives in the Park should consider at design and development stage of initiatives accessibility issues and how to overcome barriers particular users may face in terms of both access to information and accessing / using transport options. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering accessibility could act as a barrier for some people to accessing the Park, services within the Park and sustainable transport options. N1d.</p>
<p>Age / Disability /Marriage and Civil Partnerships/ Race / Sex:</p> <p>A need to assist people and families in socio-economic disadvantage to access affordable transport.</p> <p>How will issues of affordability be taken into account when developing and promoting sustainable transport solutions to ensure they are equitable? This includes ensuring interventions developed for pressure point locations do not unfairly disadvantage those with limited income.</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+/- Response: Propose amendment to wording of N1 action d to reference affordable in wording. This will assist in development of projects that take account of affordability in terms access to sustainable transport options.</p> <p>Action/ Amendment: Add affordable to N1 action d –“to provide and promote accessible and affordable public transport, active travel and low carbon-vehicle initiatives. N1d.</p>

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Response– Project Level (Collaboration): Recognise that there is a need for projects and forums addressing issues relating to sustainable transport in the Park to consider affordability and how to overcome barriers particular users may face as a result in terms of accessing and using transport options. Projects developed under W1 impact c - Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the Recreational Audit for Disabled Access (2017) will also assist with this.

Project Level Action (Collaboration): Projects focusing on and forums addressing issues relating to sustainable transport initiatives in the Park should consider at design and development stage of initiatives affordability issues and how to overcome barriers particular users may face in

	<p>accessing / using transport options. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering affordability could act as a barrier for some people to use sustainable transport options to access the Park and services within the Park. Projects and initiatives developed under W1 – c should consider potential barriers in the Park relating to affordability and sustainable transport options. W1c, N1d.</p>
<p>Age / Disability / Race</p> <p>One of the barrier areas identified through the Mosaic Project was the availability of information on getting to National Park via public transport. An issue for some disabled people is often the lack of reliable information around accessible transport and location to enable them to plan a trip.</p> <p>It is important that information on transport is responsive, up to date and easy to understand and when digital is suitable for people using technology such as screen readers.</p> <p>How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries? Are there opportunities to develop “smarter travel” pilots to test joined-up sustainable transport options and new types of on-demand, app-based</p>	<p>+/- Response – Strategic Level (Collaboration): This would be addressed by the public transport providers.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries? N1c, d.</p> <p>Response – Project Level</p>

transport normally seen in urban areas?

Note: Theme identified in Multi-agency Equality Plan consultation activities.

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(Collaboration): There are opportunities to develop collaborative innovative projects under W1 impact c – ‘Remove barriers to outdoor recreation / wellbeing opportunities, including transport barriers, and promote the opportunities to under-represented groups, e.g. by implementing solutions presented in the *Recreational Audit for Disabled Access (2017)*’ that could assist in developing improved information for users on sustainable transport options, routes and itineraries and help overcome transport related barriers to accessing the Park and use of alternatives to private car/vehicle transport.

Project Level Action

(Collaboration): Projects and initiatives should be developed collaboratively under W1 – c to help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries to help remove transport barriers to

		accessing the Park. W1c, N1d.
<p>Age / Sex</p> <p>Childhood obesity is a growing issue in Pembrokeshire. Boys are more likely to be physically active than girls in Wales.</p> <p>Are there opportunities to work with schools, parents and young people to look at ways to promote and encourage active travel in terms of walking and cycling to schools in the Park area? What are the barriers that may currently prevent children and parents from choosing active travel options?</p>	+/-	<p>Response – Strategic Level (Collaboration): This is the role of the County Council for which the Authority provides comment.</p> <p>Action/ Amendment: No further action or amendment needed.</p>
<p>Age/ Disability/ Gender Reassignment / Pregnancy and Maternity / Race/ Religion or Belief/ Sex / Sexual Orientation</p> <p>Across the protected characteristics there are issues relating to people being targeted for harassment, sexual violence, domestic abuse and hate crime and incidents. Fear or past experiences of being targeted may mean people are reluctant to use certain active travel routes or use public transport. This is an issue that is relevant for those living in the Park and also those visiting it.</p> <p>How can the Plan facilitate actions to address potential safety concerns at locations or for active travel routes or public transport, including working with transport providers and communities?</p> <p>Note: Theme identified in Multi-agency Equality Plan consultation activities.</p>	+/-	<p>Response – Strategic Level (Collaboration): This would be a matter for the transport providers in Pembrokeshire.</p> <p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the plan facilitate actions to address potential safety concerns on active travel routes or public transport, including working with transport providers and communities? N1d.</p>
<p>Age</p> <p>To help support delivery of impact identified in this policy area it is important that people have the necessary digital skills that could assist with delivery.</p>	+/-	<p>Response – Strategic Level: The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services</p>

For example skills around data collection, use of digital mapping and analysis tools that may positively impact on areas around carbon reduction and offsetting in agriculture (Current example the PLANED BRICS project - <http://www.planed.org.uk/brics/>).

What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to industries such as agriculture, fisheries and forestry?

How could the Plan support the development of skills in this area? Are there opportunities to work with Pembrokeshire College, Universities, farming unions, PLANED and others to explore this?

Would support and action in any of the above areas fall within the scope of the Plan?

Board who are implementing the Well-being Plan for Pembrokeshire. There are 8 integrated projects under the plan includes 'Recruitment and Employment Transformation Framework'; initiatives under this project should have a positive impact on employment opportunities for young people and others in the Park.

Action/ Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. **W2a and c, N1.**

Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group: What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to industries such as agriculture, fisheries and forestry? How could the plan support the development of skills in this area? Are there

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opportunities to work with Pembrokeshire College, Universities, farming unions, PLANED and others to explore this? Would support and action in any of the above areas fall within the scope of the plan? **W2a and c, N1.**

Response - Project Level:
Authority is currently reviewing its educational offer to ensure that it aligns with new curriculum including need to align with digital competency element. This would be addressed and implemented at project level in relation to W2 a. There are also potential opportunities to increase digital competency skills at project level when responding to W2 c in terms of provision of citizen science, volunteering and formal training opportunities.

Action Project Level: When developing projects and responses to action W2 a and W2 c consider where appropriate how they can assist people in developing digital competency skills (aligning with new national

			curriculum). W2a and c, N1.
Wording Amendment (Following June NPA)		N/A	Wording amendment has no impact on previous areas for consideration identified
a) Collaborate in delivery of actions in <i>Prosperity for All: a Low Carbon Wales</i> including a carbon neutral by 2030, implementing renewable energy and energy efficiency measures (see N1b), reducing transport emissions reductions (see N1d) and safeguarding and increasing carbon storage (see N3b) including agricultural soils.			
N2: Conserve and enhance water quality and restore water levels and natural flow regimes.*			
a) Support monitoring and status improvement of those water bodies in the National Park classed as poor or moderate through Natural Resources Wales' relevant River Basin Management Plan programme of measures ⁸ , the regulations scheduled for 1st January 2020 (including volume reduction and best practice management of slurry, silage, fuel oil, and agricultural chemicals; clean and dirty water separation; nutrient management planning; buffer strips and riparian fencing; cover crops and soil management in targeted catchments) and through complementary initiatives e.g. nutrient trading.			
b) Implement Flood Risk Management Plans 2015-2021 for Cleddau and Pembrokeshire Coastal Rivers, Teifi and North Ceredigion.			
Areas for consideration (Identified in Evidence and Feedback document)	Impact	+/-	Response/ Mitigation
Age	To help support delivery of impact identified in this policy area it is important that people have the necessary digital skills that could assist with delivery. For example skills around data collection, use of digital mapping and analysis	+/-	Response – Strategic Level: The Authority and Public bodies in the Park are members of the Pembrokeshire Public Services Board who are implementing the Well-being Plan for

⁸ [The programme of measures includes volume reduction and best practice management of slurry, silage, fuel oil, and agricultural chemicals; clean and dirty water separation; nutrient management planning; buffer strips and riparian fencing; cover crops and soil management in targeted catchments.](#)

tools that may positively impact on areas around agricultural practices and water pollution (Current example the PLANED BRICS project - <http://www.planed.org.uk/brics/>).

What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to agriculture?

How could the Plan support the development of skills in this area? Are there opportunities to work with Pembrokeshire College, Universities, farming unions, PLANED and others to explore this?

Would support and action in any of the above areas fall within the scope of the plan?

Pembrokeshire. There are 8 integrated projects under the plan including 'Recruitment and Employment Transformation Framework'; initiatives under this project should have a positive impact on employment opportunities for young people and others in the Park.

Action / Amendment: Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. **W2a and c, N2a.**

Action Strategic Level – Engagement (Collaboration):
Topic to consider for strategic group: What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to industries such as agriculture, fisheries and forestry? How could the plan support the development of skills in this area? Are there opportunities to work with Pembrokeshire College,

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Universities, farming unions, PLANED and others to explore this? Would support and action in any of the above areas fall within the scope of the Plan? **W2a and c, N2a.**

Response – Project Level:
Authority is currently reviewing its educational offer to ensure that it aligns with new curriculum including need to align with digital competency element. This would be addressed and implemented at project level in relation to W2 a. There are also potential opportunities to increase digital competency skills at project level when responding to W2 c in terms of provision of citizen science, volunteering and formal training opportunities.

Action Project Level: When developing projects and responses to action W2 a and W2 c consider where appropriate how they can assist people in developing digital competency skills (aligning with new national curriculum.) **W2a and c, N2a.**

<p>Age / Disability</p> <p>Quality and access to the outdoors is important to young people. Peace and Quiet important for older people in Pembrokeshire. The natural environment could be used as a potential asset to attract/retain young people in the Park / Pembrokeshire Area.</p> <p>It is positive that the Plan is looking to address issue around water pollution and quality of bathing water. Poor water quality could impact on people taking up physical activity opportunities in the sea and waterways, for example open water swimming. Potential negative health impact on people who participate in activities in the sea where there is poor water quality.</p> <p>Impacts within this policy should have positive impact on public health considerations.</p> <p><u>Note: Theme identified in Multi-agency Equality Plan consultation activities.</u></p>	<p>+</p> <p>Response– Project Level: Actions under N2 and water quality should have positive impact on public health.</p> <p>Action/ Amendment: No further action or amendment needed.</p> <p>Update following amendments to Plan (June 2019): Impact of deletion of N2b on positive impact is mitigated as action is already addressed through W1d.</p>
<p>Age / Disability</p> <p>Are there any implications for ageing in place and lifetime and accessible neighbourhoods and the design and mitigations proposed in the Flood Risk Management Plans?</p>	<p>?</p> <p>Response – Strategic: Further information is needed to assess this.</p> <p>Action – Further Information: Look at flood risk management plans to see if any implications in actions in terms of ageing in place and accessible neighbourhoods. N2c.</p>
<p>N3: Conserve and enhance soils and natural carbon storage</p>	
<p>e. Promote locally-produced, environmentally sound and socially responsible food (e.g. organic standard, community-grown or conservation-grade produce).</p>	

- f. Support soil conservation, management of peat soils, wetland protection, conservation and expansion of semi-natural habitats, trees in the landscape and reduction of artificial inputs [and protect the best and most versatile agricultural land from development⁹](#).
- g. Conserve and restore semi-natural woodland, wood pasture, trees in the landscape and field boundaries, taking into account species' connectivity needs, landscape and the impacts of plant pathogens e.g. *Chalara* ash dieback, [and pursue opportunities to reduce the impacts of non-native coniferous woodland on biodiversity and landscape](#).
- h. Manage development in accordance with Pembrokeshire Coast National Park Authority's *Local Development Plan 2* policies and guidance in relation to soil, water, air and earth heritage.

Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
<p>Age / Disability / Marriage and Civil Partnerships / Sex / Socio Economic</p> <p>Promoting community grown food through community allotments and similar projects could assist people and families in socio economic disadvantage in the Park area facing food poverty.</p> <p>Are there opportunities to work jointly with local social housing and supported housing providers, PAVS, Clyfyw Care Farm, local food banks and community organisations on joint projects?</p>	+	<p>Response – Project Level (Food Poverty): There is potential to develop projects that can assist with issues around Food Poverty through promoting community grown food initiatives (e.g. community gardens, allotments etc.) under E1 action m and N3 action a.</p> <p>Action - Project Level: Address issues relating to food poverty through collaborative development of projects under N3 a. and E1 m. in relation to community grown food initiatives (e.g. community gardens, allotments etc.) Potential to engage with existing projects and</p>

⁹ [Land of grades 1, 2 and 3a of the Agricultural Land Classification system \(Planning Policy Wales provides detailed policy prescriptions to be applied\).](#)

		work with local social housing and supported housing providers, PAVS, Clynfyw Care Farm, local food banks and community organisations on joint projects. E1m, N3a.
Age/ Disability/ Pregnancy and Maternity / Sex / Socio Economic Impacts within this policy should have positive impact on public health considerations.	+	Response - Project Level: Actions under N3 should have positive impact on public health. Action/ Amendment: No further action or amendment needed.
Addition (Following June NPA) “Manage development in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policies and guidance in relation to soil, water, air and earth heritage.”		Addition has no additional impact on areas for consideration
N4: Reduce air pollution.		
a. Support Natural Resources Wales and the agricultural sector to reduce or intercept reactive nitrogen emissions with an initial focus on potentially-affected nature conservation sites. b. Monitor and manage as necessary pollutants such as. oxides of nitrogen, carbon monoxide and particulates		
Areas for consideration (Identified in Evidence and Feedback document) and Impact	+/-	Response/ Mitigation
Age Opportunity to address Public Health Considerations in relation to emissions around schools and family beach locations. Interventions looking to manage private transport at busy family beach locations could have a positive impact on	+	Response – Project Level: Could be addressed at Project Level under W2a and work with schools. Action - Project: Consider under

<p>air pollution levels at these location</p> <p>Are there opportunities to work with schools, parents and young people to look at ways to promote and encourage active travel in terms of walking and cycling to schools in the Park area? What are the barriers that may currently prevent children and parents from choosing active travel options? Could school children be engaged in monitoring air pollution and traffic in terms of the location around their school in the Park?</p>		<p>W2 a and c development of projects with local schools that look at promoting active travel or monitoring air pollution and traffic in terms of location around their school in the Park. W2a and c, N4a and b.</p>
<p>Rewording (Following June NPA)</p> <p>“Monitor and manage as necessary pollutants such as. oxides of nitrogen, carbon monoxide and particulates”</p>		<p>Rewording has no additional impact on areas for consideration</p>
<p>Additional Issues to Consider not addressed in above sections</p>		
<p>Areas for consideration (Identified in Evidence and Feedback document) and Impact</p>	<p>+/-</p>	<p>Response/ Mitigation</p>
<p>Equality Impact Assessment Summary</p>		
<p>Initial Considerations:</p> <p>N1: Impacts relating to - Barriers to accessing and using active travel and public transport for some groups. Addressing future digital skills gaps that could help deliver impacts.</p> <p>N2: Impacts relating to - Addressing future digital skills gaps that could help deliver impacts. Positive impacts on public health. Impact of mitigation actions for flood risk management plans on ageing in place and lifetime and accessible neighbourhoods.</p> <p>N3: Impact relating to - Joint working opportunities and positive impact of promotion of community grown food. Positive</p>		

impact on public health.

N4: *Impact relating to - Positive impact on public health. Opportunities to work with schools, parents and children to promote active travel to reduce air pollution around schools in the Park.*

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Actions and Implementation (Amendments)

Actions	Implemented By	Timescale	Outcome
<p>Action/ Amendment: Add affordable to L3. A –“to provide and promote accessible and affordable public transport, active travel and low carbon- vehicle initiatives.” (L3. Action a)</p>	CPO, 21/5/19	Version to 5 th June NPA	<p>L3 (a) text revised to:</p> <p>Collaborate through the Pembrokeshire Greenways Partnership to provide and promote accessible and affordable public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.</p>
<p>Action/ Amendment: Include section in Park Plan on having an ‘Ongoing conversation about the Park’ taking into account how people can influence decisions about the Park, how we engage a wide range of people on an ongoing basis and also provide information on progress and issues suitable and accessible for different audiences. (A Landscape for Life and Livelihoods)</p>	CPO, 21/5/19	Version to 5 th June NPA	<p>L1 (a) text revised to:</p> <p>Engage on an ongoing basis with a wide range of people about management of the National Park to achieve National Park purposes.</p>
<p>Add to impact e, ‘Work collaboratively with others to</p>	CPO, 21/5/19	Version to 5 th June	<p>New impact added at W1 (h):</p>

Actions	Implemented By	Timescale	Outcome
<p>ensure the promotion of the Park as a destination reaches and is representative of more diverse audiences.’ – ‘Collaborate through the Destination Pembrokeshire Partnership to manage Pembrokeshire and the National Park as a sustainable destination. Work collaboratively with others to ensure the promotion of the Park as a destination reaches and is representative of more diverse audiences’ – (W1: Action e) Note additional action has been included in document.</p>		NPA	<p>Work collaboratively with others to ensure the promotion of the National Park as a destination reaches and is representative of more diverse audiences, including children and young families from deprived areas.</p>
<p>Add mental health related projects to W1. k - Collaborate in delivery of nature-based health services, including targeted walking programmes, mental health related projects and supporting people living with dementia.” (W1: Action k)</p>	CPO, 21/5/19	Version to 5 th June NPA	<p>W1 (m) text amended to; Collaborate in delivery of nature-based health services, including targeted walking programmes, mental health initiatives, and supporting people living with dementia.</p>
<p>Add accessible and affordable to W1. g - Collaborate through the Pembrokeshire Greenways Partnership to provide and</p>	CPO, 21/5/19	Version to 5 th June	<p>W1 (i) text amended to; Collaborate through the Pembrokeshire Greenways Partnership to provide and promote accessible and</p>

Actions	Implemented By	Timescale	Outcome
<p>promote <i>accessible and affordable</i> public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations. (W1: Action g)</p>		NPA	affordable public transport, active travel and low-carbon vehicle initiatives, and to contribute to traffic management at specific locations.
<p>Action/ Amendment: Add mental health related projects to W1. k - Collaborate in delivery of nature-based health services, including targeted walking programmes, mental health related projects and supporting people living with dementia.” (W1: Action k)</p>	CPO, 21/5/19	Version to 5 th June NPA	W1 (m) text amended to; Collaborate in delivery of nature-based health services, including targeted walking programmes, mental health initiatives, and supporting people living with dementia.
<p>Amend the following “Raise public awareness and enjoyment of historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation.” To “Raise public awareness and enjoyment</p>	CPO, 21/5/19	Version to 5 th June NPA	H1 (a) amended to: Raise public awareness and enjoyment of historic landscapes, buildings and monuments, increase appropriate access to them and engage and support communities and volunteers in heritage monitoring and conservation.

Actions	Implemented By	Timescale	Outcome
of <i>and increase access to</i> historic landscapes, buildings and monuments and engage and support communities and volunteers in heritage monitoring and conservation.” (H1: Action a)			
Suggest amending H2 c from ‘Collaborate with local communities to celebrate and record dialect, customs, songs, crafts and other attributes of local identity.’ to ‘Collaborate with local communities <i>and others</i> to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park <i>and provide opportunities for people to share stories about their relationship with the landscape and their own heritage.</i> (H2: Action c)	CPO, 21/5/19	Version to 5 th June NPA	H2 (c) amended to: Collaborate with local communities and others to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park and provide opportunities for people to share stories about their relationship with the landscape and their own heritage.
Action/ Amendment: Add accessible and affordable to N1 action d “to provide and promote	CPO, 21/5/19	Version to 5 th June	N1 (e) amended to; Collaborate through the Pembrokeshire Greenways

Actions	Implemented By	Timescale	Outcome
accessible and affordable public transport, active travel and low-carbon vehicle initiatives. (N1: Action d)		NPA	Partnership to provide and promote accessible and affordable public transport, active travel and low-carbon vehicle initiatives.
Include more explicit reference in Management Plan to supporting the delivery of PSB 8 projects and working in collaboration with Public Service Board Members to address issues facing communities within the Park area. (A Landscape for Life and Livelihoods .Well-being, enjoyment and discovery. W2: Action a and c. E1. H1. N1. N2: Action a).	CPO, 21/5/19	Version to 5 th June NPA	<p>L1 (e) amended to: Collaborate in delivery of projects arising from the <i>Pembrokeshire Well-being Plan</i>, e.g. Meaningful Community Engagement.</p> <p>W1(d) amended to: Collaborate in delivery of projects arising from the <i>Pembrokeshire Well-being Plan</i>, e.g. Celebrating the Great Outdoors.</p> <p>E1 (p) inserted: Collaborate in delivery of projects arising from the <i>Pembrokeshire Well-being Plan</i>, e.g. Environmental and Climate Change Risk Assessment.</p> <p>H2 (e) amended to; Collaborate in delivery of projects arising from the <i>Pembrokeshire Well-being Plan</i>, e.g. Community Participation.</p> <p>N1 (c) amended to: Collaborate in delivery of projects arising from the</p>

Actions	Implemented By	Timescale	Outcome
			<i>Pembrokeshire Well-being Plan</i> , e.g. Becoming a Carbon-neutral County.

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Actions and Implementation (Further Information)

Actions	Implemented By	Timescale	Outcome
<p>What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? (Well-being, enjoyment and discovery)</p>	<p>CPO</p>	<p>28/10/19</p>	<p>Wales Audit Office report <i>Local Government Services to Rural Communities</i> November 2018 recommendations https://www.audit.wales/system/files/publications/LG-services-to-rural-communities-report-english.pdf gives a comprehensive overview but by its nature does not contain the granularity needed to shape detailed project level decisions.</p> <p>From a search of the Lle geoportal for “community” or “facilities” the only relevant datasets that are returned are Active Travel Designated Localities (which already feature in the maps for the Management Plan) and the WIMD (which is considered in the Sustainability Appraisal for the Management Plan under “Access to services”).</p> <p>An approach was made with the Pembrokeshire Association of Voluntary Services and contact will be continued during the Plan period.</p>
<p>Look at flood risk management plans to see if any implications in actions in terms of ageing in place and accessible neighbourhoods. (N2: Action c)</p>	<p>CPO</p>	<p>27/10/19</p>	<p>-LDP2 Coastal Change Management Areas were mapped onto output areas (Census data) where at least 40% of residents are over 60 (ageing in place).</p> <p>There are 6 intersections: Newport, Lower Solva, Tenby</p>

Actions	Implemented By	Timescale	Outcome
			north, Tenby south, Saundersfoot, Wiseman's Bridge. This brings potential project level / communication opportunities during Plan period.

Actions and Implementation (Engagement)

Actions	Implemented By	Timescale	Outcome
<p>Topic to consider for strategic group/ Greenways Partnership - In looking to promote sustainable transport what consideration has been taken of public transport routes and wider transport networks within the Park, Pembrokeshire and regionally. (L3: Action a)</p>	Management Plan Reference Group – Discussion (24/10/19)	During Consultation Period	<p>Key points from discussion:</p> <ul style="list-style-type: none"> • Local Authorities may in future be able to specify bus routes rather than provider (but scope of doing this dependent on funding). • Legal Requirement changes to buses in terms of accessibility by 2020 (could be a challenge for some operators) • Legislation in terms of taxis and accessibility delayed <p>At Local Level in terms of Plan:</p> <p>Potential opportunities to feed into Local transport funding</p>

Actions	Implemented By	Timescale	Outcome
			<p>bids via Local Authority. Being followed up by officers.</p> <p>Look at how Authority can engage with PACTO and other organisations involved in Community Transport.</p> <p>(Deliver through project level responses)</p> <p>Strategic Level:</p> <p>Mindful of how aspirations in Plan link with wider strategic developments tied to City Regions and Integrated Transport. Outside the control of the Plan.</p>
<p>Action/ Additional Information Needed: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? (A Landscape for Life and Livelihoods)</p>			
<p>Action Community Level – Engagement: Topic to consider with Community Councils: What community facilities are at risk in the Park area, are there less opportunities for accessing these</p>	<p>CPO</p>	<p>28/10/19</p>	<p>An approach was made with the Pembrokeshire Association of Voluntary Services and contact will be continued during the Plan period.</p>

Actions	Implemented By	Timescale	Outcome
<p>opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (A Landscape for Life and Livelihoods)</p>			
<p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group; What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (A Landscape for Life and Livelihoods)</p>	<p>Management Plan Reference Group – Discussion (24/10/19)</p>	<p>During Consultation Period</p>	<p>Key discussion points:</p> <ul style="list-style-type: none"> • PCC has second highest number of public toilets in a local authority area, exploration of management options for them. Smaller, rural, low use, less accessible toilets at risk (lower capacity for communities to take ownership of them). Example of Cresswell Quay in terms of community run facility. • Linkages with destination management • Examples given of Monmouthshire and post office franchises • PCC focus on facilities in county towns • Crowd sourcing opportunities (e.g. Tafarn Sinc) • Discussion on capacity within communities. • Positive example of Narberth (Community run

Actions	Implemented By	Timescale	Outcome
			<p>swimming pool, Broomfield, Span Art, Library</p> <ul style="list-style-type: none"> • Hybrid Facilities – Change of use flexibility and other potential models (home pub on weekend, toilet services, ATM in pubs) • Potential planning consideration. • PCC community Asset Transfer updating policy – community right to bid (first chance) • Re--use of ecclesiastical buildings <p>The relevant “Landscape for life and livelihoods” impact is “Manage development in accordance with Pembrokeshire Coast National Park Authority’s <i>Local Development Plan 2</i> policy, regarding major development, defence sites, lighting, amenity, employment, housing allocations, housing windfall sites and exceptional land releases for affordable housing to promote sustainable communities, in particular.”</p>
<p>Action Community Level – Engagement: Topic to consider with Youth Rangers: Although formal training opportunities is referenced in the section on well-being, enjoyment and discovery which aligns with the PSB work on Employment Transformation, how could the plan better</p>			<p>Action during Plan period: continued work with Youth Rangers, working with education and training providers in responding to future business demand; SDF Fund, recreation industry etc.</p>

Actions	Implemented By	Timescale	Outcome
address concerns from younger people about limited range of employment opportunities in the Park area and pay. (A Landscape for Life and Livelihoods)			
<p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group: Who could the Authority work with to address above issues, e.g. Pembrokeshire college, Universities, local businesses, other public bodies? Could more be done to assist new business start-ups or young people looking to start up their own business / working self-employed in the Park? Could the Plan support any recommendations or learn from the findings from the Bluestone Resorts Ltd -Feasibility Study and Business Plan for Tourism and Hospitality Vocational Training and LEADER project focused on Building Pembrokeshire’s Capacity to Care. How does the plan address</p>	<p>Management Plan Reference Group – Discussion (24/10/19)</p>	<p>During Consultation Period</p>	<p>Discussion Point:</p> <ul style="list-style-type: none"> - Difficult Issue - Opportunities to engage with Pembrokeshire College (tailoring local opportunities) and others carrying out work in this area (Bluestone and hospitality training) - Opportunities in terms of the Marine Renewable Sector (Swansea Bay Deal etc.), issues re recruitment. - Transport can be an issue (link in to sustainable transport) - Off season events to increase tourism season <p>Further discussions between PCNPA Officers to explore how this issue could potentially be captured in the plan. Noted how increasing the length of tourism season (without additional peaking) –could have positive impact on (currently) seasonal jobs. Link to the Community Benefits (Procurement).</p>

Actions	Implemented By	Timescale	Outcome
<p>any future and current employment trends including the gig economy and demand and skills development in relation to specific industries – countryside management, forestry, marine and renewable energy, tourism and recreation, agriculture, fisheries, digital industries, health and social care, education? What are the current challenges facing young people in Pembrokeshire looking to access these industries and also responses to skills around digital competency? Could further work be carried out to assist development of digital skills within agricultural sector and young people looking to work in this sector? Would support and action in any of the above areas fall within the scope of the Plan? (A Landscape for Life and Livelihoods)</p>			<p>See references to LDP in A landscape for life and livelihoods.</p> <p>Project level: work with education and training providers in responding to future business demand; SDF Fund, recreation industry etc.</p>
<p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group: Does the National Park</p>	<p>Management Plan Reference</p>	<p>During Consultation Period</p>	<p>Brief discussion:</p> <ul style="list-style-type: none"> - Wider Digital infrastructure and local developments in terms of digital infrastructure.

Actions	Implemented By	Timescale	Outcome
<p>Management Plan have a role in relation to supporting collaborative initiatives to improve digital connectivity in the Park, or is this outside the scope of the Plan. If yes, what impact would the Plan be looking to develop and who would need to be engaged with to support delivery of projects/ initiatives under it. (A Landscape for Life and Livelihoods)</p>	<p>Group – Discussion (24/10/19)</p>		<p>- Potential to utilise digital when liked at project level to other areas.</p>
<p>Action Community Level – Engagement: Topic to consider as part of consultation: How would people like the Authority to engage with them in terms of having an ‘ongoing conversation about the Park’ and providing information on progress or new challenges during the Plan period? (A Landscape for Life and Livelihoods)</p>	<p>Through Formal Consultation</p>		<p>Discussion at reference group on how to celebrate achievements (Potential options – Story Mapping/ events)</p>
<p>Action – Engagement PCNPA: Engagement Action Plan group to explore wording and ideas relating to section on having and</p>	<p>CPO 29/10</p>		<p>Theme to be continued during the Plan period.</p>

Actions	Implemented By	Timescale	Outcome
'ongoing conversation' / engagement. (A Landscape for Life and Livelihoods)			
Action – Engagement PCNPA: What initial opportunities / learning have been identified from the current accessible and inclusive audit review of PCNPA sites? (W1: Action c)	N/A	During Plan Period	Link to wider Experiences for All, which will provide evidence during Plan period to inform actions.
Action Community Level – Engagement: Topic to consider with Community Councils: What community facilities are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points / facilities? How could the Plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (Well-being, enjoyment and discovery)			See earlier responses.
Topic to consider for strategic group: What community facilities			See earlier response

Actions	Implemented By	Timescale	Outcome
<p>are at risk in the Park area, are there less opportunities for accessing these opportunities in certain locations within the Park? Are there opportunities to further engage with community councils to map community focal points/ facilities? How could the plan further support the sustainability of community facilities including libraries, pubs, banks and toilet facilities? (Well-being, enjoyment and discovery)</p>			
<p>Action Strategic Level – Engagement (Collaboration): Topic to consider for strategic group/ Greenways Partnership - How can the Plan help address affordability issues that may impact on people accessing sustainable transport options in the Park area. (W1: Action g. N1: Action d))</p>			<p>See earlier response</p>

Actions	Implemented By	Timescale	Outcome
<p>PCNPA to consider use of beaches re mission churches and use of heritage sites for worship / celebrations: Seek feedback on extent of issue. Is impact/action sufficient? Are there any considerations for Project Level actions/response? (H2. Action d)</p>	<p><u>CPO in consultation with relevant Authority Officers</u></p>	<p><u>Consultation Period</u></p>	<p><u>Saundersfoot is currently the only location in Pembrokeshire where a mission church operates (usually for about 3 weeks of the summer with daily activities for children, including singing, possibly using a PA). It works here because the beach is always busy in summer even in poor weather and as a resort beach this is considered to be an appropriate location for it.</u></p> <p><u>This type of beach activity has the potential to detract from 'quiet enjoyment' in a more rural setting if it was happening daily (one-off events could be accommodated), however the NPA has never had complaints so it is not considered an issue.</u></p> <p><u>Worship / celebrations</u></p> <p><u>Improving knowledge of practices and potential issues is necessary and the Heritage Watch scheme is one route.</u></p> <p><u>Communication with relevant communities (local communities and communities of interest) is essential to being able to put mitigation measures in place.</u></p> <p><u>St Govan's Chapel is regularly used by worshippers with offerings, flowers and candles regularly left in the chapel.</u></p>

Actions	Implemented By	Timescale	Outcome
			<p><u>Items left in the chapel are tactfully removed and any money donated. There are occasional requests for wedding ceremonies to be held there which the NPA may agree, although people cannot have exclusive use and they must be prepared for members of the public to come through.</u></p> <p><u>Considerations for Project Level actions/response</u></p> <p><u>The profusion of memorials with flowers, engraved stones, urns and plaques screwed to trees, benches, path furniture or even to the rock on a cliff top has become a significant and increasing issue as has the number of requests for memorial seats.</u></p>
<p>Consult PCNPA staff on whether promotion of schemes such as Eco Schools, The Global learning programme for Wales, would be covered by project level work under W2 a - Deliver active outdoor, heritage and arts-based recreation and learning / play opportunities via schools programmes and lesson packages, family activities and</p>	<p><u>CPO in consultation with relevant Authority Officers</u></p>	<p><u>Consultation Period</u></p>	<p><u>To an extent promotion of both Eco-schools (and the Pembrokeshire version, Sustainable Schools) would be covered under that broad heading. PCNPA does not outwardly promote either, but these opportunities are flagged-up as and when appropriate - for example in meeting a teacher / headteacher and when providing advice PCNPA would be likely to mention these options. PCNPA staff occasionally assist on Eco-schools / sustainable schools assessments.</u></p> <p><u>Pembrokeshire Outdoor Schools partnership has representation from both Sustainable Schools and Eco-</u></p>

Actions	Implemented By	Timescale	Outcome
<p>events, early years provision, and a focus on young people (particularly young people in deprived urban areas) or if explicit reference is needed. Is Pembrokeshire Outdoor Schools involved in promoting any schemes? Are they aware of the extent schools in Park are currently engaged with these schemes? (W2: Action a)</p>			<p>schools, staff from both are regular contributors to the partnerships work - for example in running training sessions for teachers.</p> <p>PCNPA does not have data on the numbers of schools that are Eco-schools or Sustainable Schools, but the information does exist.</p>
<p>Engage with local schools and Pembrokeshire Outdoor schools to see if they have appetite or are already involved with schemes such as Eco Schools / The Global Learning Programme for Wales etc.? (W2: Action a)</p>			<p>See above</p>
<p>Action – Engagement PCNPA staff: Are there any current issues in relation to access and conservation areas and historic buildings in the Park? How are issues relating to accessible and</p>	<p>CPO in consultation with relevant Authority Officers</p>	<p>Consultation Period</p>	<p>Lifetime neighbourhoods are places designed to be inclusive regardless of age or disability.</p> <p>In April 2019 Welsh Government consulted on <i>Easy access to listed buildings in Wales</i> to which PCNPA responded. Responses were published October 2019, final document to follow.</p>

Actions	Implemented By	Timescale	Outcome
lifetime neighbourhoods addressed within conservation areas? (H1)			<p><u>Easy access to listed buildings in Wales</u> is intended to help all those who own, manage or occupy listed buildings in Wales. It should also assist those who plan alterations or advise on alternative forms of service provision. It is especially relevant for those listed buildings that offer services, such as catering, banking or shopping, or which people visit for leisure, work or education purposes.</p> <p>Although <u>Easy access to listed buildings in Wales</u> applies specifically to listed buildings, the approaches described are applicable to any historic building in Wales.</p> <p><u>Approved Document M of the Building Regulations for Wales</u> and <u>BS 8300 Design of an Accessible and Inclusive Built Environment</u> provide advice and guidance about broader policies, practices and procedures relating to access. They also contain general design guidance. Additional advice about design is available in <u>Technical Advice Note 12: Design</u> and from the Design Commission for Wales in <u>Inclusive Design in the Built Environment: Who Do we Design For?</u></p> <p>Decision-making authorities should also use the guidance alongside <u>Planning Policy Wales, Technical Advice Note 24: The Historic Environment and Conservation Principles</u> to inform their own policies and when considering individual applications for planning permission and listed building consent, including pre-application discussions.</p>

Actions	Implemented By	Timescale	Outcome
			<p><u>The Equality Act 2010, the Wales specific equality duties and the Public Sector Equality Duty provide a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act covers discrimination because of protected characteristics including age and disability. The Act sets out the different ways in which it is unlawful to treat someone. This includes direct and indirect discrimination, harassment, victimisation and failing to make a reasonable adjustment for a disabled person. People and organisations who own, manage or occupy listed buildings in Wales, and who have duties under the service provider, employer, education and other provisions of the Act, need to ensure that they do not discriminate against people with protected characteristics. When considering physical access to listed buildings and their surroundings it is necessary to take account of duties relating to disabled people and to consider potential barriers to access. However, it is important to remember that the Equality Act 2010 is about people and not buildings. It does not include standards for accessible building design, though following the good-practice guidance listed can help duty holders to provide a reasonable standard of access so that they fulfil their duties under the Act.</u></p>
<p>Speak to relevant PCNPA staff for further guidance in relation to revision of Parking Standards</p>	<p><u>CPO in consultation with relevant</u></p>	<p><u>Consultation Period</u></p>	<p><u>Any SPG reviews will follow LDP2 adoption, no action at this point.</u></p>

Actions	Implemented By	Timescale	Outcome
SPG (accessibility) (L3: Action a. N1. action d))	Authority Officers		
Topic to consider for strategic group/ Greenways Partnership - How can the plan help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries? (L3: Action a. W1: Action g. N1: Action: c. Action d.))			See above response
Topic to consider for strategic group / Greenways Partnership - How can the Plan facilitate actions to address potential safety concerns on active travel routes or public transport, including working with transport providers and communities? (L3: Action a. W1: Action g. N1: Action d))			See response above
Topic to consider for strategic			See responsees above

Actions	Implemented By	Timescale	Outcome
<p>group: What are the current and future skills needed and where are the capacity gaps across age groups in the county relating to industries such as agriculture, fisheries and forestry? How could the plan support the development of skills in this area? Are there opportunities to work with Pembrokeshire College, Universities, farming unions, PLANED and others to explore this? Would support and action in any of the above areas fall within the scope of the plan? (W2: Action a and c. E1. N1. N2: Action a).</p>			<p>Strategic steer provided by the PSB Recruitment and Employment Transformation Project</p>

Actions and Implementation (Project Level)

Actions	Implemented By	Timescale	Outcome
Addressing issues relating to age and dementia friendly neighbourhoods through development of projects under W1: c and k (W1: Action c and k)	CPO and relevant Authority Officers and partner orgs	During Plan Period	
Projects focusing on light pollution/ minimisation and dark skies should consider at design and development stage secure by design principles and potential safety implications of projects and identify mechanism for concerns and issues to be mitigated Consideration should be taken of impacts on both residents and visitors with a recognition that safety concerns could act as a barrier for some people to accessing the Park or local services/ public transport opportunities particularly in winter months. (L1. Action a and b)	CPO and relevant Authority Officers and partner orgs	During Plan Period	

Actions	Implemented By	Timescale	Outcome
<p>Explore opportunities for developing projects under L1 impact area c and b that link light pollution reduction with approaches to reducing fuel poverty, including exploring opportunities to develop joint projects with housing associations and fuel poverty/energy charities. (L1. Action a and b)</p>	<p>CPO and relevant Authority Officers and partner orgs</p>	<p>During Plan Period</p>	
<p>Projects focusing on and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park should consider at design and development stage of initiatives accessibility issues and how to overcome barriers particular users may face in terms of both access to information and accessing/ using transport option. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering accessibility could act as a barrier for some people to</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
accessing the Park, services within the Park and sustainable transport options. (L3: Action a. W1: Action g. N1. action d)			
Working with local businesses and communities in terms of initiatives around areas such as increasing provision of changing and baby changing facilities, promoting breast feeding welcoming venues, dementia friendly venues, hosting autism hours, continued hosting of beach wheelchairs under W1: c and k and H1: a. (W1: Action c and k. H1: Action a)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
Addressing issues relating to barriers in leisure, arts and recreational opportunities for disabled people through development of projects under W1: a, b and c (W1: Action a, b and c)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	

Actions	Implemented By	Timescale	Outcome
Addressing issues relating to provision of Beach Wheelchairs and resting places (benches) on PROW routes and Authority owned land/ facilities through development of projects under W1: a, b and c. (W1: Action a, b and c)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
Individual Proposals for Management mechanisms used to deal with recreational conflict and pressure point locations will need to consider equality impacts to ensure they do not unfairly disadvantage or discriminate against disabled people and can put in place mitigating actions where needed (W1: Action d.).	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
Develop projects that support the promotion of the Park as a destination to more diverse audiences and that its portrayal as a destination is more	CPO and relevant Authority Officers and partner orgs/	During Plan Period	W1 h “Work collaboratively with others to ensure the promotion of the National Park as a destination reaches and is representative of more diverse audiences, including

Actions	Implemented By	Timescale	Outcome
<p>representative through W1: e (Dependent on amendment being included). (W1: e) – Note additional action has been included in document – ref new action.</p>	<p>local businesses and communities</p>		<p>children and young families from deprived areas.”</p>
<p>Develop projects that support people with less opportunities to access the outdoors in more urban environment to gain access , participate in opportunities and benefit from the Park’s outdoor environment through W1: c and W2: a. (W1: action c. W2 action a)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>Projects focusing on and forums addressing issues relating to health and well-being should consider at design and development stage of initiatives potential barriers people may face and how to ensure a service is inclusive. In particular how</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
<p>people's past experiences of health services may impact on their engagement with a project and how projects linked to walking/ physical activity could get involved with Stonewall Cymru's rainbow laces campaign and other similar opportunities. (W1: Action c and k)</p>	<p>communities</p>		
<p>Addressing issues relating to age and dementia friendly neighbourhoods through development of projects under W1: c and k (W1: Action c and k)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>Addressing issues relating to mental health including projects focused on mental health and young people and those looking at suicide prevention through development of projects under</p>	<p>CPO and relevant Authority Officers and partner orgs/ local</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
W1: k. Addressing mental health issues that can face expectant and new parents through development of projects under W1: k and W2 a. (W1: Action k. W2: Action a)	businesses and communities		
Addressing issues relating to loneliness, social isolation and promoting intergenerational activity through projects developed under W1.c, W1.k, W2.c and H2 c. Consider how nature of cultural activities under H2 c could be expanded to reach new audiences and enable Authority to pass on Park messages/ information on how people can help protect the Park. (W1. Action c and k. W2. Action c. H2: Action c)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
Project Level Action: Individual Proposals for Management mechanisms used to deal with recreational conflict and pressure	CPO and relevant Authority Officers and	During Plan Period	

Actions	Implemented By	Timescale	Outcome
<p>point locations will need to consider equality impacts to ensure they do not unfairly disadvantage or discriminate against disabled people and can put in place mitigating actions where needed (W1: Action d and f.).</p>	<p>partner orgs/ local businesses and communities</p>		
<p>Projects developed were appropriate under W1 c, W2 c, and W1 k should engage with relevant organisations and agencies to provide opportunities for people who have been victims of crime, harassment, domestic abuse, sexual violence, hate crime to regain their confidence (if relevant) to access the outdoors and benefit from other positive and confidence building opportunities within the Park. (W1: Action c, k. W2: Action c.)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>Projects developed to address W1, d, c and l should ensure that</p>	<p>CPO and relevant</p>	<p>During Plan</p>	

Actions	Implemented By	Timescale	Outcome
<p>the messages, information and formats they use are accessible an easy to understand and suitable for different audiences. Consideration should be made of how information and the channels used to communicate may need to be tailored to reach diverse audiences, including practical engagement that explores issues and effective social media campaigns. (W1: Actions d, c and i)</p>	<p>Authority Officers and partner orgs/ local businesses and communities</p>	<p>Period</p>	
<p>When developing projects under W2 c and H2 c consideration of opportunities to work with others and Gypsy and Traveller Communities on joint projects relating to Heritage of Pembrokeshire Gypsies and Travellers. (W2: Action c. H2: Action c)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>Where appropriate when projects are being development and</p>	<p>CPO and relevant</p>	<p>During Plan</p>	

Actions	Implemented By	Timescale	Outcome
<p>designed under impact W2 a those involved should engage with existing networks of sporting clubs and associations in the Park and surrounding area to identify gaps and barriers to participation and to see if specific project needs to be developed, including promoting and design of opportunities in terms of physical activities for girls?</p> <p><u>Consider Dyfed Archaeology suggestion of Land army days working on the farm to assist with promoting physical activities for girls or similar schemes. Ensure projects also include heritage projects such as heritage trails/ walks with children exploring historic landscape.</u> (W2: Action a)</p>	<p><u>Authority Officers and partner orgs/ local businesses and communities</u></p>	<p><u>Period</u></p>	
<p>Addressing issues relating to ensuring that children from schools in more deprived area gain access to learning opportunities in the Park,</p>	<p><u>CPO and relevant Authority Officers and partner orgs/</u></p>	<p><u>During Plan Period</u></p>	

Actions	Implemented By	Timescale	Outcome
<p>provision of work placements includes opportunities for people with additional learning needs and that young carers are supported through development of projects under W1: c and W2 a and e. (W1: Action c. W2: Action a and e)</p>	<p>local businesses and communities</p>		
<p>When designing, developing and delivering outdoor education and play opportunities for young people, projects should ensure that issues such as prevention and challenging of bullying and discriminatory language are built in to project design with staff provided adequate training. Could Pembrokeshire Outdoor Schools play a role in this. (W2: Action a)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>Action Project Level: Projects and responses developed under W2c in terms of citizen science, volunteering and training</p>	<p>CPO and relevant Authority Officers and</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
<p>opportunities should look to address potential barriers people may face to being able to access these opportunities. Projects and responses should seek to learn from existing and past projects such as Pathways and their findings and responses in relation to barriers to taking up volunteering or other opportunities. (W2: Action c)</p>	<p>partner orgs/ local businesses and communities</p>		
<p>Explore opportunities for developing projects under L2 action c and b that link light pollution reduction with approaches to reducing fuel poverty, including exploring opportunities to develop joint projects with housing associations and fuel poverty/energy charities. (L2: Action c and b. Well-being, enjoyment and discovery)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
<p>When developing projects relating to mental health consider how issues relating to debt/ financial insecurity can be addressed, linking in with relevant agencies including farming unions, fisheries bodies, citizen's advice and other relevant organisations. (W1: Action k)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>Projects developed to address E1 action e and m, should ensure that the messages, information and formats they use are accessible an easy to understand and suitable for different audiences. Consideration should be made of how information and the channels used to communicate may need to be tailored to reach diverse audiences, including practical engagement that explores issues and effective social media</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
campaigns.			
<p>Individual Proposals and responses under E1 action i used to address issues relating to marine litter and associated issues will need to consider equality impacts to ensure they do not unfairly disadvantage or discriminate against disabled people and can put in place mitigating actions where needed. This includes thinking about how initiatives can make it easier and remove barriers for disabled people so that they are able to benefit from opportunities to assist with issues around marine litter (e.g. location of recycling bins, design of water fountains). (E1: Action i)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>When developing and designing interpretation material and layout under E1 action k , consideration should be taken of how these can</p>	<p>CPO and relevant Authority Officers and</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
be made accessible, (particularly for disabled people with different sorts of disabilities) and be relevant and engaging for diverse audiences. (E1: Action k)	partner orgs/ local businesses and communities		
Projects focusing on light pollution/ minimisation should consider at design and development stage secure by design principles and potential safety implications of projects and identify mechanism for concerns and issues to be mitigated. Consideration should be taken of impacts on both residents and visitors with a recognition that safety concerns could act as a barrier for some people to accessing the Park or local services/ public transport opportunities particularly in winter months. (E1: Action g)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
Develop projects that support the promotion of the Park's heritage	CPO and relevant	During Plan	

Actions	Implemented By	Timescale	Outcome
<p>and cultural sites as a destination to more diverse audiences and that its portrayal of these sites as a destination is more representative as a result of amendments to H1 action a and amendments around destination promotion in W1. (W1. H1: Action a)</p>	<p>Authority Officers and partner orgs/ local businesses and communities</p>	<p>Period</p>	
<p>Ensure when developing interpretation materials and projects accessibility and mechanisms to make them inclusive are taken into account. Consider how projects could link in or promote schemes like Hynt, Autism hour, dementia friendly attractions in the Park area or a Park specific 'Gig buddies' style scheme to help increase access to recreation opportunities in the Park area. Consider development of travelling 'road shows' to bring teraching collections to adults with dementia or mobility issues.</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
(W1: action c and k. W2: Action b. H1: action a (amended))			
Continue to support delivery of community focused events and fairs at heritage and cultural centres within the Park under H1 a (amended). (H1: Action a)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
When developing projects under W1c and W2 opportunities to link in and work collaboratively with schemes such as family holiday initiatives or schemes that can reduce transport costs will be considered (this includes enabling people to access heritage and cultural opportunities within the Park). Including the development of collaborative opportunities for joint projects with organisations	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	

Actions	Implemented By	Timescale	Outcome
such as Gingerbread, local social housing and support housing providers. (W1: Action c. W2 Action a. H1: Action a (amended).)			
Projects and responses developed under W2c and H1 a in terms of citizen science and volunteering should look to address potential barriers people may face to being able to access these opportunities. Projects and responses should seek to learn from existing and past projects such as Pathways and their findings and responses in relation to barriers to taking up volunteering or other opportunities. (W2. Action c. H1. Action a)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
When developing and designing interpretation material and layout under H2 action a , consideration should be taken of how these can	CPO and relevant Authority Officers and	During Plan Period	

Actions	Implemented By	Timescale	Outcome
be made accessible, (particularly for disabled people with different sorts of disabilities) and be relevant and engaging for diverse audiences. (H2. Action a)	partner orgs/ local businesses and communities		
Consider how culture, heritage, story-telling and arts based projects and sites promoted under H1 action a (amended) and H2 c can host specific events e.g. celebrating LGBT history month (and Pembrokeshire based LGBT History), link in with projects such as Iris Prize and work with local LGBT groups and promote sites as LGBT friendly. (W1: action c. W2: action b. H1: action a (amended). H2 action c)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	
Consider how projects developed under H2 c can ensure that a broad perspective and interpretation of local identity can be captured and is not limited to one narrative (e.g. looking for	CPO and relevant Authority Officers and partner orgs/ local	During Plan Period	

Actions	Implemented By	Timescale	Outcome
<p>opportunities to promote and celebrate Pembrokeshire Gypsy and Traveller heritage.) and encourage events that celebrate diversity and encourage wider interpretations and sharing of stories about people's relationship with the landscape and their heritage. (H2: Action c)</p>	<p>businesses and communities</p>		
<p>Development of responses under W1 c and k should consider how Welsh language could be used to develop projects that enable people to find out more about the park while also addressing social isolation issues. Development of responses in relation to H2 action b and c should consider how Welsh Language projects can help address issues around social isolation and loneliness and bring people together and opportunities to work with communities to develop Welsh language community hubs/focal</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
points. (W1: Action c and K. H2: Action b and c)			
<p>In developing projects in response to this continuous engagement will be needed with communities to ensure guidance and positive relations are maintained. This could be done through Heritage Watch Scheme <u>and exploring options around having a more 'open door' approach providing access to certain sites at certain times.</u> (H2: Action d)</p>	<p><u>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</u></p>	<p><u>During Plan Period</u></p>	
<p>Project Level Action (Collaboration): Projects focusing on and forums addressing issues relating to public transport, active travel and low-carbon vehicle initiatives in the Park should consider at design and development stage of initiatives accessibility issues and how to overcome barriers particular</p>	<p><u>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</u></p>	<p><u>During Plan Period</u></p>	

Actions	Implemented By	Timescale	Outcome
<p>users may face in terms of both access to information and accessing/ using transport option. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering accessibility could act as a barrier for some people to accessing the Park, services within the Park and sustainable transport options. (W1: action g. N1: action d)</p>			
<p>Projects focusing on and forums addressing issues relating to sustainable transport initiatives in the Park should consider at design and development stage of initiatives affordability issues and how to overcome barriers particular users may face in accessing/ using transport options. Consideration should be taken of impacts on both residents and visitors with a recognition that not considering</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
<p>affordability could act as a barrier for some people to use sustainable transport options to access the Park and services within the Park. Projects and initiatives developed under W1 – c should consider potential barriers in the Park relating to affordability and sustainable transport options. (L3: Action a. W1: Action c and g. N1: Action d)</p>			
<p>Projects and initiatives should be developed collaboratively under W1 – c to help facilitate improved information for users with range of access or communication needs on sustainable transport provision, routes and itineraries to help remove transport barriers to accessing the Park. (L3: Action a. W1: Action c and g. N1: Action d.)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	
<p>When developing projects and responses to action W2 a and</p>	<p>CPO and relevant</p>	<p>During Plan</p>	

Actions	Implemented By	Timescale	Outcome
<p>W2 c consider where appropriate how they can assist people in developing digital competency skills (aligning with new national curriculum.) (W2: Action a and c. E1. N1. N2: Action a).</p>	<p>Authority Officers and partner orgs/ local businesses and communities</p>	<p>Period</p>	
<p>Address issues relating to food poverty through collaborative development of projects under N3 a and E1 m in relation to community grown food initiatives (e.g. community gardens, allotments etc.) Potential to engage with existing projects and work with local social housing and supported housing providers, PAVS, Clynyw Care Farm, local food banks and community organisations on joint projects. (Well-being, enjoyment and discovery .E1: Action m. N3: Action A)</p>	<p>CPO and relevant Authority Officers and partner orgs/ local businesses and communities</p>	<p>During Plan Period</p>	

Actions	Implemented By	Timescale	Outcome
Consider under W2 a and c development of projects with local schools that look at promoting active travel or monitoring air pollution and traffic in terms of location around their school in the Park. (W2: Action a and c. N4: Action a and b)	CPO and relevant Authority Officers and partner orgs/ local businesses and communities	During Plan Period	

DRAFT

Monitoring and Review

List details of any follow-up work that will be undertaken in relation to the policy (e.g. consultations, specific monitoring etc).

Project level actions will be monitored in terms of their implementation during the National Park Management Plan, plan period.

Declaration

Does the policy or decision have a significant impact upon equality issues?

Yes

(The results of all impact assessments where the impact is significant will be published on the Authority's website)

Signed By

M Thomas / M Regelous

Lead Officer

26/11/2019

Date

Appendix 1

Consideration of feedback from strategic equality plan 2020 – 24 Multi-agency consultation.

Key organisations operating within Dyfed Powys worked collaboratively to deliver a joint consultation exercise.¹⁰ A mixed methods approach was employed to elicit the views and experiences of stakeholders across Dyfed Powys (comprising Carmarthenshire, Ceredigion, Pembrokeshire and Powys). It was agreed to produce one master survey (and sister versions) and where possible, to hold local stakeholder events in each of the four regions. This approach increased the robustness of collected data and facilitated comparability of results.

Survey Feedback

Master survey

Surveys are a well-established research method that provides breadth and depth of opinion at reasonable costs. In developing the survey, local agencies were keen to find out whether people's experiences of their services differed owing to their demographic characteristics. Recognising that equality is paramount across an exhaustive list of services, the survey focused on the Equality and Human Rights Commission's six major areas of life, as set out in 'Is Wales Fairer 2018'. These are education, work, living standards, health, justice and personal security and participation.

Respondents were asked whether people with different characteristics generally have better or worse experiences of a prescribed list of services in comparison to the population as a whole. A Likert scale was utilised to establish whether twelve different demographic groups have 'much better', 'better', 'the same', 'worse' or 'much worse' experiences of a particular service. This was useful in recording attitudinal data (how respondents perceive other groups to be treated) and actualities (what those of particular ethnicities, age etc. thought of their own experiences). The latter is possible through filtering/disaggregating responses. Emphasis was given to identifying respondents' demographic characteristics (age, gender, ethnicity etc.) in order that the views of different groups be reflected in the report.

In addition, the master consultation survey was published in Welsh, English and Polish, reflecting the demographic composition of the four counties. In order to ensure we offered an accessible service an easy ready version was available to the public.

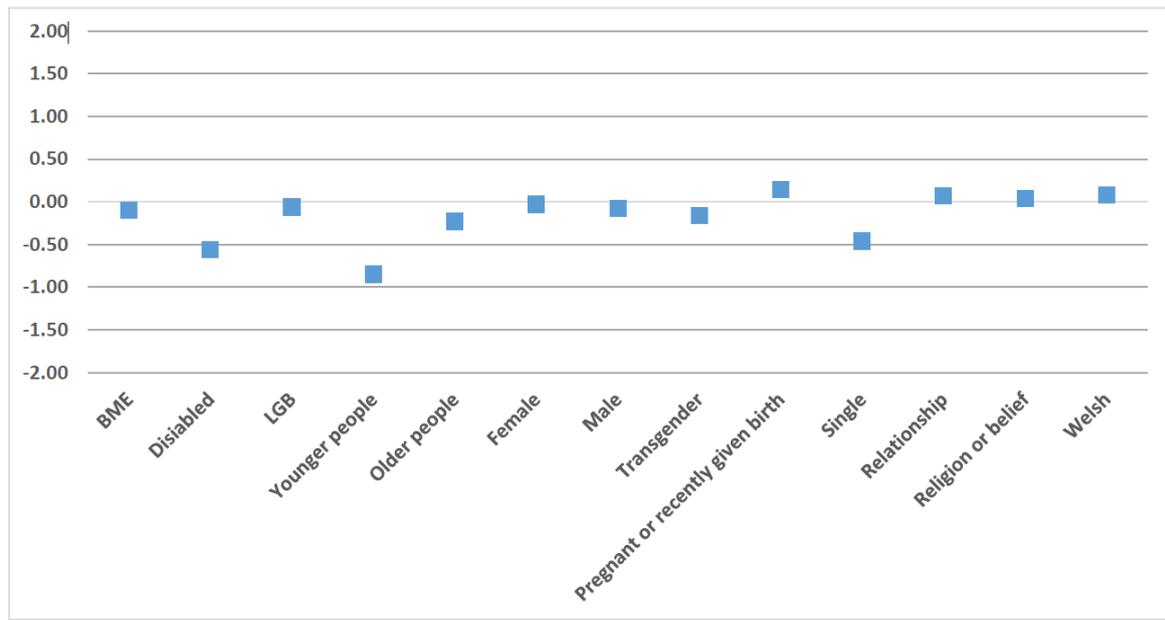
Survey reporting relies heavily on a weighted average technique, referred to throughout as the Average Index Score (AIS). Qualitative data has been analysed

¹⁰ Dyfed Powys Police; Hywel Dda University Health Board; Powys Teaching NHS Trust; Mid and West Wales Fire and Rescue Service; Welsh Ambulance Service; Carmarthenshire County Council; Ceredigion County Council; Pembrokeshire County Council; Powys County Council, Brecon Beacons National Park Authority and Pembrokeshire Coast National Park

by, first, coding responses on the basis of emerging themes; then, offering a synopsis of pertinent codes/themes. Analysis and reporting of survey results was undertaken by members of the Corporate Policy team at Carmarthenshire County Council.

Relevant information from the Survey for the EIA on the National Park Management Plan:

Housing



- There are considerable inconsistencies in the experiences of different demographic groups (indicated by the pattern of the above chart): some are believed to have better experiences, some worse, whilst several groups are perceived to have similar experiences in comparison to the population as a whole.
- An AIS of 0.14 for pregnant women/those recently given birth confirms a perception that this group have slightly better experiences of housing.
- The majority of demographic groups are seen to have worse experiences of housing. In particular, significantly lower, negative AISs were recorded for three groups – signifying markedly worse experiences –namely, younger people (AIS of -0.85), those with disabilities (AIS of -0.56) and single people (AIS of -0.46)

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

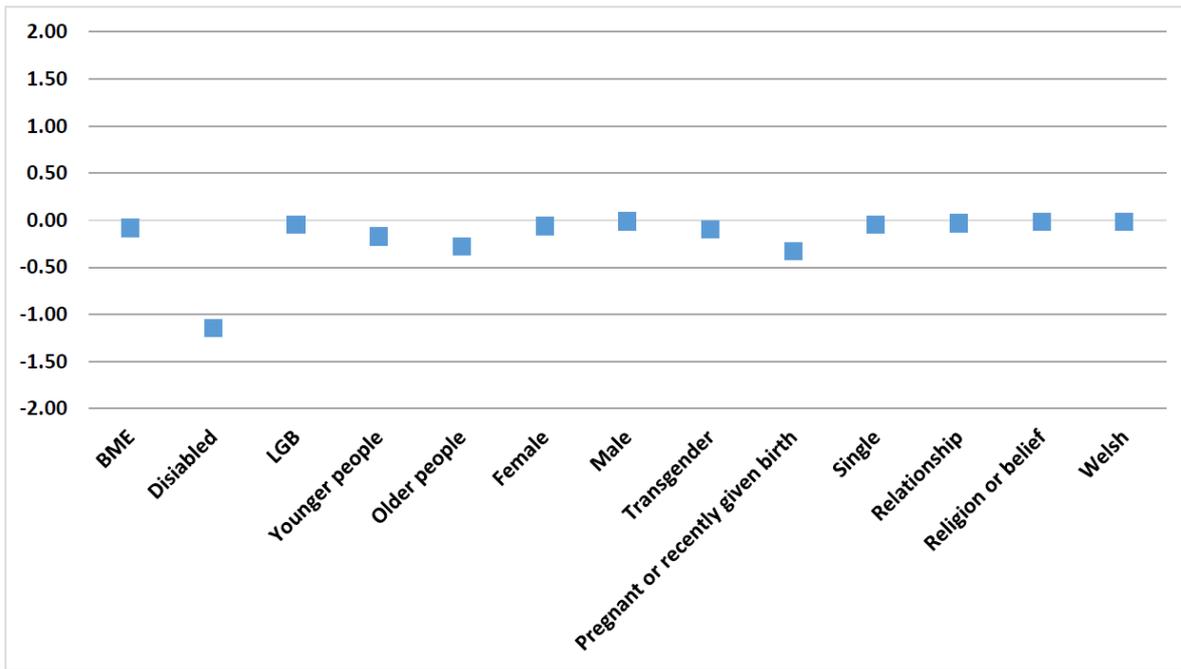
- There is a stigma attached with being disabled and there is not enough disability friendly housing or housing for those who are older and need care or young who wish to stay in the area.
- Housing for the over 65s?? What housing?? There is little to no decent sheltered or supported housing option within Pembrokeshire,

- The under 25s have no chance either, they are told they cannot access housing benefits, but there is no affordable housing in the area - new builds are shabbily constructed (how much are the back-handers?) and certainly not what I would term 'affordable' to either buy or rent. .
- Youngsters leave home earlier which puts a strain on available accommodation
- Perhaps single bedroom accommodation from the public sector might be the stepping stone to self sufficiency.
- It seems younger people have it harder to get accommodation
- One homeless hostel, very limited social housing 1 bed properties, high unemployment, low wages.
- I know from personal experience or would anticipate in other cases a certain amount of prejudice and there is a shortfall of housing available to younger people.
- Rental cost are outrageous
- Young people find finding suitable housing very hard.
- Accessing suitable housing for disabled people is difficult, especially in rural areas with the additional transport challenges. Young people, particularly those leaving care, find it difficult to find suitable housing. There is very little housing for single people, it's more geared to families.
- Not enough social housing as a whole without the added need to accessible units for disabled people
- No specific experience and, therefore, not informed enough to comment.
- Mae'n anodd iawn cael help o ran dod o hyd i dŷ cyngor er enghraifft, fel person sengl. (It is hard to get help in terms of accessing council house, for a single person)
- Difficult for young to find housing
- Young people do not get appropriate housing often falling into the trap of renting privately where living conditions can be appalling and expensive.
- One bedroom units very scarce, private landlords not very welcoming of benefit recipients, or younger age groups

Consideration for Impact Assessment:

- Lack of accessible and suitable housing provision for disabled people
- Lack of affordable housing for young and single people

Access to Transport



- On balance, it was felt that most demographic groups have relatively similar experiences in respect of access to transport when compared to the population as a whole. This is indicated by the tight clustering of AISs around the 0.
- The AIS for disabled people (-1.14) is a significant outlier: access to transport is perceived to be a much worse experience for disabled people in comparison to the population as a whole. Low AISs also recorded for older people (-0.28) and pregnant women/those recently given birth (-0.33). This suggests that they also have worse experiences.
- No group was thought to have distinctly better experiences which is represented with negative scores. This suggests that all groups are perceived to have worse experiences in respect of accessing transport

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

- Lack of transport again for those with disabilities and also for the young and old who rely so heavily on it. There is a lack of consideration for young people.
- There is not enough accessible public transport locally as it is only currently on some of the bigger routes. I have seen elderly people struggle to use the steps on some of the buses locally.
- Busos with only sufficient room for one pram or wheelchair, so if there is already a disabled person on the bus, then a second person has to wait for anything up to 4 hours for the next bus and hope that the wheelchair space is free. Young mothers being removed from buses to allow wheelchairs on is unacceptable.
- Transport in rural areas seems scarce, younger people rely very much on cars. generally unable to afford the fares, limited transport links
- Public transport in Pembrokeshire is so bad I could not leave my house if I did not have a car. So I can only assume this is the same for everyone.

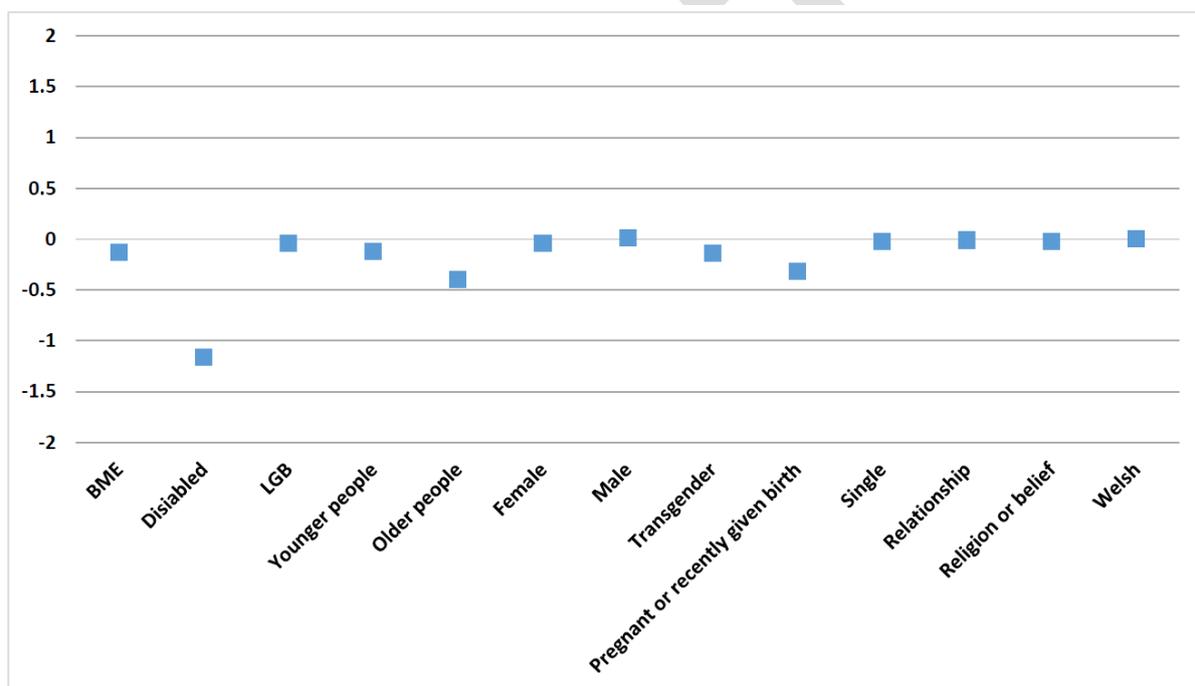
- Difficult to access trains and buses in a wheelchair or with a pram because it's quite embarrassing to have to hold people up while you try to get on/have the ramp taken out for you and set up
- Limited buses and can't be sure it's wheelchair friendly
- Not all buses can accommodate people with disabilities as yet. People who qualify for bus pass will be at an advantage over any group who have to pay for their transport needs. People (of many groups) in a more rural location will be at a disadvantage because there will be less opportunities to access transport.
- Bus passes. Deals on trains/taxis for elderly
- Anecdotal evidence and own experience of seeing e.g. Cars parked across ramps and traffic wardens doing nothing
- I use first Cymru buses regularly and the drivers are amazing helping the disabled, elderly and mums with pushchairs accessing the bus
- In rural Pembrokeshire, unless you have your own transport it is very difficult to get anywhere. Buses are few and far between, trains are limited as to where they stop.
- Difficult if you are disabled or elderly or young, i.e. not having money to travel
- Public transport by local bus is reliable, but there are no buses in the evening in our area, again being disabled or older it is hard to hang around waiting for buses and not always able to walk any distance to a bus stop. The train service is not at all reliable and doesn't run frequently enough or connect properly to be usable as a local transport service. I live in Saundersfoot and work in Haverfordwest but there is no train suitable to get me to work which is a shame as it could be quicker possibly than driving.
- In rural areas, public transport is patchy to say the least. For people with a wide range of disabilities it's hugely problematic. There are not enough wheelchair spaces on public transport and they are usually shared with prams. If the space is already taken there is no room for an additional user. There are reduced services at weekends with few services on Sundays meaning people can't access shopping, social or sporting activities easily. There are also issues with taxi services for people with physical or sensory impairments.
- The only group that may have problems I believe are those whose disability makes it difficult for them to use all public transport
- As stated previously, poor public transport provided in Pembrokeshire and even less accessible public transport for disabled people
- Too few buses. Rural areas cut off. Can't afford fares.
- Public transport is poor for all
- Low on priority agendas. Rural transport is a disgrace.
- If you don't drive in Wales it can be difficult to use public transport, this I would think affects under 25s the most
- Transport is geared to mobile persons, needs to take into account accessibility from care homes
- Generally speaking most transport providers are in a position to meet the needs of their users, however, there have been some instances where disabled people are not provided with facilities which meet their needs.
- Public transport in Pembrokeshire is poor so we all suffer the same, this is worse for the old and disabled

- hate crime and discrimination, verbal abuse on public transport is a very stark reality for gay people, trans people, and ethnic minority people. I personally avoid public transport as much as I can for fear of abuse

Consideration for Impact Assessment:

- Negative experiences for disabled people in terms of access to suitable accessible public transport and taxi services
- Negative experiences for new parents accessing public transport with buggies/ prams
- Certain groups may face hate crime when accessing public transports
- Broader issues relating to cost, frequency and timing of services

Leisure and Access to the Coast and Countryside



- In the main, different demographic groups are thought to have broadly similar experiences in respect of social, leisure and countryside access – the majority of AISs are tightly clustered around the neutral zero value – with any perceived differences in experiences considered to be marginally worse or better
- Disabled people are one notable exception to the rule. Respondents’ recognised that disabled people have significantly worse experiences of Leisure and Access to the Coast and Countryside in comparison to the population as a whole – indicated with an AIS of -1.16.
- Older people (-0.40) and pregnant women/those recently given birth (-0.32) were also seen to have slightly worse experiences of Leisure and Access to the Coast and Countryside.

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

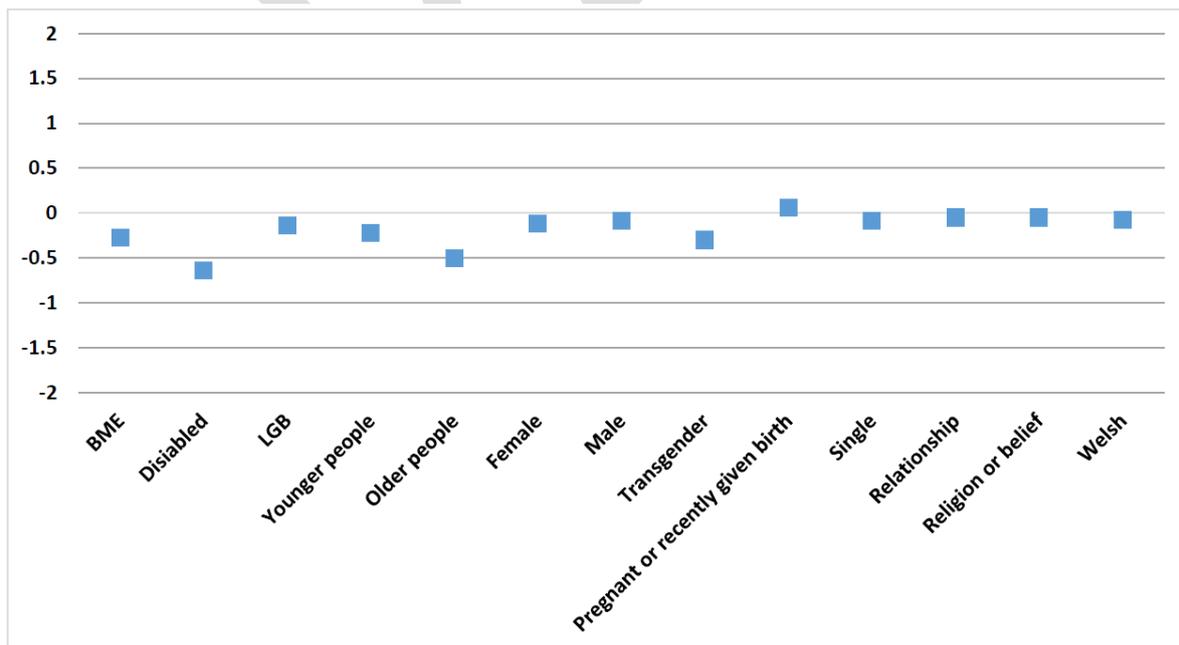
- Disabled/elderly access to beaches and countryside is terrible in Wales including toilet facilities
- Disabled individuals struggle to access the seaside and of course what provision is there for leisure?
- It is more difficult for people on either end of the age spectrum to access leisure due to the cost of parking in the areas, the price of bus fares (and sometimes the lack of rural routes where many people live) and general difficulties regarding accessibility for the elderly. We have beautiful countryside locally which is vastly underused by its population.
- Little to no wheelchair access to our beaches.
- Reduction in bus services. Implementation of car parking charges in beach areas
- There are coastal buses but I have never been on one, should be family friendly as its great to see them at leisure.
- Disabled adaptations and access quite poor
- Access to large areas of Pembrokeshire (Even the library in Haverfordwest) is difficult, some for geographical reasons. Public toilets are regularly shut or difficult to enter. They & parking are both charged for but poorly kept. This alone reduces the ability to use these & stops use of facilities or the countryside.
- Nothing to do for young people, nothing for new parents with babies other than baby groups which aren't that helpful especially for dads as my male partner doesn't feel welcome at any parent and baby groups/meetings
- Very little wheelchair access terrible.
- Some coastal areas aren't suitable for wheelchairs
- I have no problem with access to the country and coast as that is where I live. My difficulty is in going to a city such as Swansea or Camarthen. Very few transport links - you have to be able to drive
- Disabled access to the coast and countryside is reasonable, parking etc but often access to beaches is via steps or uneven paths which are not accessible. Although there is usually disabled parking, the spaces fill very quickly.
- As with my previous answer, the suitability and availability of public transport is an issue. One thing this survey also needs to bear in mind is poverty. Many of these protected characteristics live in poverty and do not have the financial means to access the countryside or leisure facilities.
- I know that it can be difficult for older & disabled people to have access to country paths. Many of these are not easily accessible.
- not enough accessible public transport and facilities to reach the countryside
- Very limited marketing targetted at groups/individuals with 'protected characteristics'. Similarly, there is still much to achieve in terms of making access to the countryside more easily available to a wider variety of people but especially individuals with physical disabilities - needs significant investment in the public rights of way infrastructure.
- Nothing for under 18s and youth centre cuts. Lots of pubs and drinking but little else, no cinema, everything requires unaffordable cost AND travel.
- There are limited areas for the young to in particular

- Beaches Esp Newgale very difficult to access there is no pathway and pebbles too difficult for those unstable on their feet.
- Leisure access for those who are disabled can be difficult to achieve again because of financial constraints. Generally speaking the majority of recreational facilities meet basic statutory requirements, however, coats are again a factor which has to be properly considered.
- A beach wheelchair is not the answer to some when there is no one to push it.
- Many areas are not suitable for disabled people to access

Consideration for Impact Assessment:

- Negative experiences and barriers for disabled people in terms of access to beaches and countryside. Concern about wheelchair access to beaches, concern around access at Newgale beach for people with limited mobility.
- Consideration of when someone may need additional assistance to access services such as beach wheelchair e.g. need someone to push it – are there volunteering opportunities or potential for gig buddies style scheme.
- Impact of cost for younger and older people in terms of transport
- Limited marketing targeted at groups/individuals with ‘protected characteristics’ to protected groups
- Lack of activities for young people and new parents
- Problems going to other locations outside of Pembrokeshire due to poor transport links
- Access to facilities – public toilets

Health



- As depicted in the graph above, different demographic groups are thought to have broadly similar experiences in respect to health in comparison to the wider population.

- Of all listed groups, disabled people (AIS of -0.64); older people (AIS of -0.50); transgender people (AIS of -0.30) and those from ethnic minority groups were perceived to have particularly worse experiences of health in comparison to the population as a whole.
- Pregnant women or those recently given birth were perceived as having slightly better experiences of health services (AIS of 0.06). This result is a notable outlier given the high positive AIS and its position in comparison to other demographic groups

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

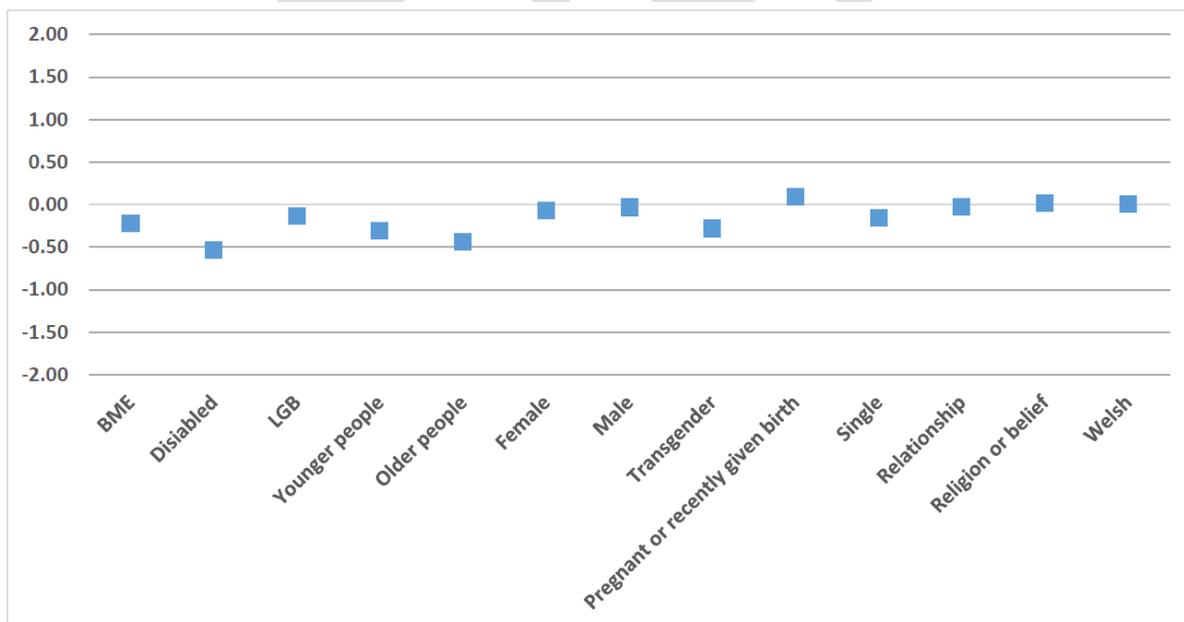
- Having been diagnosed with multiple health problems (mental and physical), I have found Pembrokeshire to be the most difficult place to obtain support in a timely manner. I have to attend appointments at a hospital 45 minutes away instead of my local hospital due to the downgrading of services and I have not been offered sufficient mental health support since my return here a few years ago. As a younger person, I have seen first hand the impact of this.
- Both physical and mental health services in the county are stretched to breaking point, but mental health services especially are now virtually non-existent.
- Constantly reduction in services - especially paediatric and maternity
- 10hr wait to see Crisis Team when someone is feeling suicidal, appointments and calls not kept.
- As a lesbian not always taken seriously by health professionals
- Living in Pembrokeshire we have lost doctor's surgeries, doctors who do still practice are having to see twice as many patients. Maternity care has moved out of Pembrokeshire, pregnant women are forced to travel to Carmarthen to give birth. Withybush, although an excellent hospital is constantly being downgraded and is losing services. It is impossible to get the doctors and specialists we need (possibly because they are not offered enough pay)
- Overall my husband and I have had reasonably positive experiences of the healthcare system in this area, it is not always very well joined up though. I We have an ageing population with multiple chronic health problems and this is increasing. Older people are unable to leave hospital once medically fit because there isn't timely, adequately care provided, especially if you live alone and can't rely on family. Provision for people with physical, learning or sensory impairments is patchy at best or generally poor. There appears to be poor understanding of mental health and neuro diverse conditions in young people, and of dementia in the elderly.
- Pembrokeshire people are at a disadvantage as health facilities for the county have been and are continuing to be downgraded making it difficult for everyone in the county to reach the relevant health professionals at Glangwili and further afield
- Since local healthcare is abysmal, I would believe that we all equally have limited access, long waits, and poor service when it comes to health care.
- Health is a strange term, but being excluded or different in some way can and does affect your health.

- having arthritis effects my mobility but I still think of myself as in reasonable good health
- 1:7 LGBTQ people avoid healthcare treatment for fear of discrimination. 25% of LGBTQ people have experienced a lack of understanding of their specific health needs - this figure rises to 62% for trans patients. I have personally experienced unequal treatment due to my sexual orientation and my gender expression, both as a patient and while attending healthcare appointments to support my partner. On a number of occasions I was asked to leave an appointment as the clinician would not speak to my partner with me in the room, and on another occasion my partner was not allowed to stay by my bedside to wait for a doctor during an emergency admission out of hours despite the fact that two other people in beds adjacent had their spouses waiting with them to see a doctor.

Consideration for Impact Assessment:

- Access to transport as people are having to travel significant distances to access health services
- Negative experiences in terms of treatment for LGBT people when accessing health services, a need to ensure well-being offers and projects related to the Park are inclusive
- Mental Health and Support Provision

Access to Care and Support



- When examining respondents perceptions of accessing care and support, the experiences of many different demographic groups are thought to be fairly consistent with the experiences of the population as a whole – as depicted above by the congregation of AISs around 0 (Neutral point) For example, AISs for females, males, individuals who are single, in a relationship and hold a religion or belief, to name but a few

- Of all listed groups, individuals who have a disability are deemed to have the worst experiences (-0.53).
- It can also be seen that individuals from an ethnic minority (-0.22), Younger people (-0.31), Older people (-0.43) and transgender people (-0.28) are all perceived to have worse experiences of accessing care and support in comparison to the population as a whole.

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

- I believe that public transport restricts many people in Pembrokeshire due to a lack of it from rural areas. Young people also aren't financially secure enough in general to be able to afford housing, membership for leisure services etc.
- All have the same chance of 'enjoying' the mediocre and non-existent 'care' provision in this county.
- There is NO support for people with mental health issues, CHC are so busy fighting with social care over funding, that care packages are not awarded until sometimes AFTER a person has died!! This appalling scenario is replicated in Carmarthenshire where people are having to fight tooth and nail to access any sort of care or support
- Older people and single people can suffer from loneliness as the younger adults having to work in order to pay for the upkeep of their family which doesn't leave time to create a more caring society
- Never been offered any support
- Had practically no support after a traumatic birth as a young mum, health visitors didn't bother showing up, other support reached out too such as GP dismissed concerns
- Very poor help and support for mental health problems
- Cost of getting help for care and support services has gone up a great deal.
- Everyone has equal access but extra charities may be available for certain groups
- There are various resources available although whether or not people goose to access is another matter
- Attitudes to the elderly are bad when they complain. Younger workers treat them unfairly
- difficult to access public transport in rural areas.
- Elderly and young may not have advocate to help them
- . Agency domiciliary care is patchy and generally unsatisfactory. Support for people with mental health problems is poor and for young people it's very poor with specialist services sometimes miles away for the young person's home.
- Does dim llawer o wasanaethau gofal ar gael drwy'r Gymraeg. Mae'r lefel o hiliaeth yn erbyn pobl o wledydd eraill ac o gefndiroedd ethnig/crefyddau gwahanol yn peri gofid i mi.
- There is no bus public transport after 6pm or on Sundays in Pembrokeshire so youngsters can't socialise
- Not enough access to antenatal care and hospitals of choice for pregnant women. Severe lack of midwives. Very difficult to access health care and

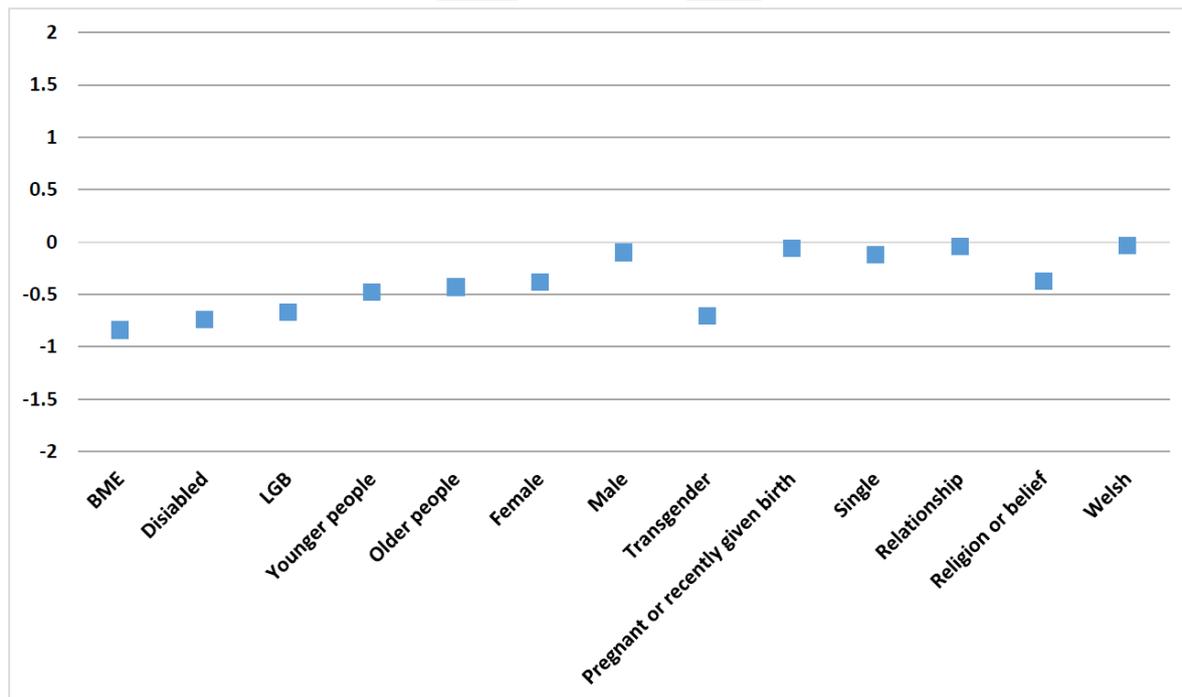
support if disabled and living in a rural area, or for people who are less well-off financially.

- it's hard if you have health problems and don;t drive to access things that others take for granted.
- I beleive that genreally speaking all people are teated fairly when accessing care and support, however, I firmly beleive that financial considerations are a valid reason why some services are not available. No organisation can meet 100% of the needs of an individual.
- Services for younger people with mental health problems are poor, this is also the case for pregnant women with mental health problem, and no units for mother and baby in Wales within mental health

Consideration for Impact Assessment:

- Mental Health Support provision, particularly young people
- Support for pregnant and new parents
- Transport issues within Pembrokeshire – accessing appointments, impact on social isolation

Crime



- In comparison to the population as a whole, a number of demographic groups are thought to have significantly worse experiences of crime in comparison to the population as a whole.
- Of all listed groups, respondents consider those from ethnic minority groups (AIS of -0.84); those with a disability (AIS of -0.74); transgender people (AIS of -0.70) and LGB (AIS of -0.67) to have the worst experiences of crime. Similarly low AISs were recorded for younger people (-0.48); Older people (AIS of -0.43); Females (AIS of -0.38) and those who hold a religion of belief (AIS of -0.37).

- Overall it was seen that all demographic groups are seen to have worse experiences of crime in comparison to the population as a whole. This is highlighted with all groups reporting negative AIS scores.

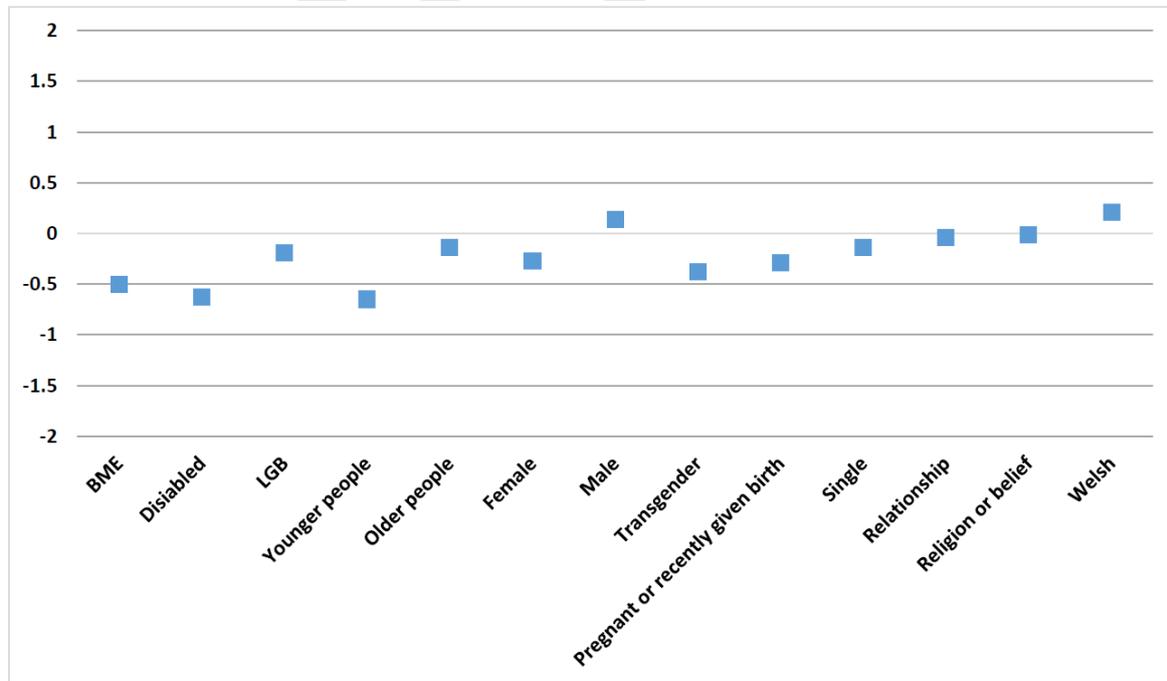
Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

- Hate crime is rife in schools across Pembrokeshire and there is a reluctance to call it that.
- I do not have any problems where I live everyone looks after each other
- Elderly people can be seen as easy targets, so can single females out alone
- LGBTQ/Trans people experience hate crime on a regular basis. it varies from nasty remarks to verbal and sometimes physical abuse. I think hate crime towards trans people especially is on the rise and more prevalent than towards LGB people. My experience of reporting hate crime though has been positive with the case officer being sensitive and compassionate in dealing with the issue, and following up with me afterwards

Consideration for Impact Assessment:

- Awareness impact hate crime and harassment could have on people accessing the Park and in using public transport, particularly for people from ethnic minority groups, disabled people and transgender people.
- Issues relating to hate crime and harassment in terms of experience of young people in schools

Influencing Decisions



- As depicted in the graph above, people's experiences of being able to influence decisions are seen to vary according to their demographic group.
- The lowest recorded AIS was for younger people (-0.65), suggesting a perception that this demographic are often unable to influence decisions. Disabled people (-0.63), transgender people (-0.38) and BME groups (both -0.50) are also thought to have worse experiences in comparison to the population as a whole in being able to influence decisions.
- Only two demographic groups are perceived to have better experiences of influencing decisions in comparison to the population as a whole. Males (0.14) and Welsh speakers (0.21) are perceived to have better experiences.

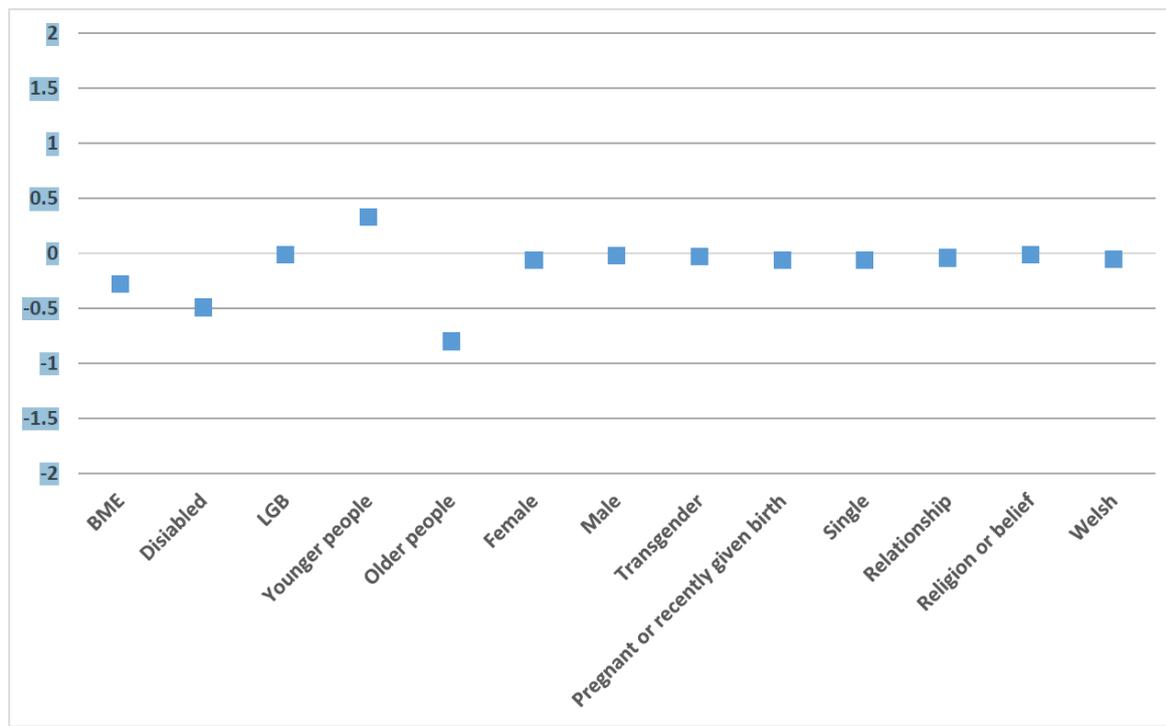
Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

- Those that shout louder get heard
- All the minorities struggle to influence decisions
- No one in authority listens, they consult to tick a box
- Generally people in the older age bracket have more time and are able to attend events (which I have seen held during working hours meaning I could not attend). I also believe the voices of the older generation are listened to more locally as they are the bigger group of people compared to their younger counterparts..
- The people who can make these decisions seem to be far more concerned with their own positions to spend much time bothering about the consequences on others
- Not taken seriously
- As far as council decisions go, everything is put on the local council website regarding consultation over changes. I have only stumbled across these by accident so presume very few people are aware that these consultations are there, hence there must be a very low response rate to these consultations so things get approved without a proper public opinion
- It very much depends how people's views are being sought. Public bodies are more aware of their duty to engage 'seldom heard' people, and are making a greater effort in this regard. The general feeling among some protected groups is that their opinion doesn't count and nothing will be done anyway. There are also linguistic and cultural barriers that prohibit some groups from participating. It's getting better, but there's a long way to go.
- Anyone who takes time & trouble to influence a decision will surely carry the same weight.
- Lack of diversity on most public boards!
- Old-fashioned and narrow-minded attitudes locally.
- Having worked in local and central government I believe that facilities for younger people can be squeezed such that other groups receive a higher slice of the resources.
- Numbers play a role in the influence people have

Consideration for Impact Assessment:

- [Engaging diverse range of people in ongoing conversation about the Park.](#)

Access to Information and Digital Services



- [As seen, different demographic groups are thought to have broadly similar experiences in respect to Access to Information and Digital Services in comparison to the wider population.](#)
- [Respondents consider three demographic groups to have markedly worse experiences, with the AIS for older people \(-0.80\) being the lowest recorded result. This is in stark contrast to younger people who are perceived to have better experiences of accessing information and digital services \(0.33\) which is also the highest recorded AIS.](#)
- [The other two demographic groups which received a low AIS are; those with a disability \(-0.49\) and those from ethnic minority groups \(-0.28\).](#)
- [The remaining demographic characteristic groups are thought to have broadly similar experiences in respect to accessing information and digital services in comparison to the wider population.](#)

[Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:](#)

- [Improvement in rural areas for broadband](#)
- [Poor internet connections in rural areas](#)
- [We are being slowly forced into there being no option but to use digital services, many elderly don't understand or wish to use these, the areas lower paid strgle with the costs in many cases, being single makes it more of an expense. A person at a counter is a service.](#)
- [The main problem can be digital competence which is not necessarily a factor for a particular group, but for people as individuals. also the problem of](#)

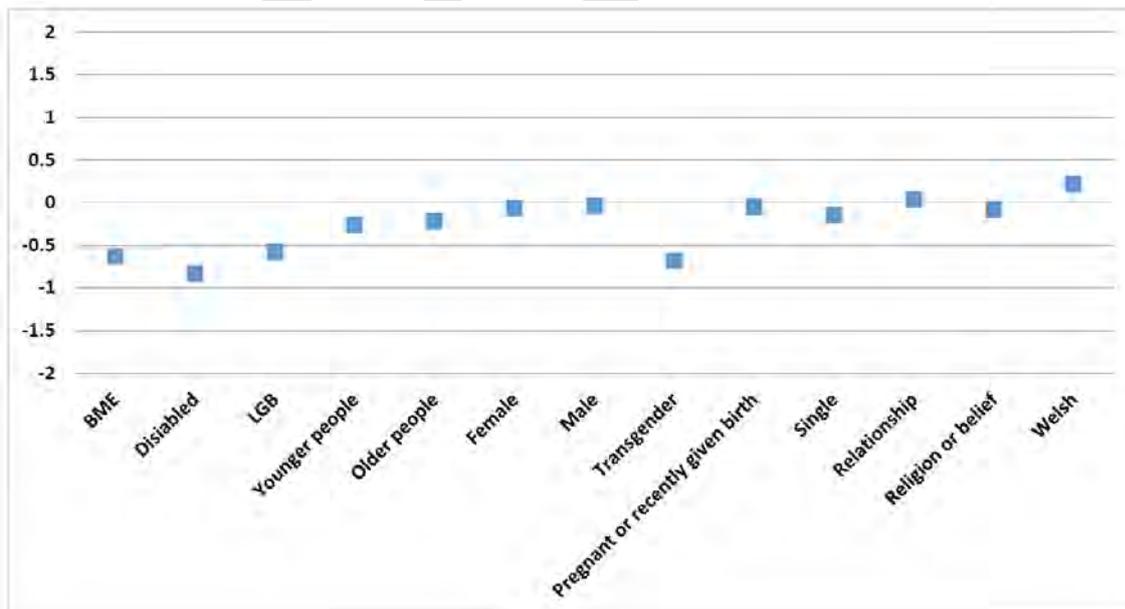
accessing the internet because of black spots rather than which group they may be identified with.

- The elderly don't use the internet and all the banks in Milford Haven are [c]losing bad decision
- Older people may find access to information and digital services more difficult.
- Many older and disabled people struggle with digital access and are not necessarily IT literate
- Generally some older people find the thought of accessing information and services online daunting.
- Still a lot of people are overlooked because they are not online.
- It's been difficult for my mother to cope with a digital age
- Provision of information is the same for whatever group you belong to.
- Access to information is there for all whether some are able to obtain it is a different matter; low pay may restrict your ability to access information, the very old may not be able to operate the equipment needed even if they have it.

Consideration for Impact Assessment

- Ensuring information about the Park and engagement is accessible for all, consideration of how projects that only communicate digitally may impact on older people
- Access to facilities in the Park and broader issues relating to digital connectivity (broadband access)

Getting on Together in the Community



- Respondents consider four demographic groups to have markedly worse experiences, with the AIS for those with a disability (-0.83) being the lowest recorded result. This is closely followed by transgender people (-0.68); ethnic minorities (-0.63); and LGBs (-0.57).

- The AISs for Welsh speakers (0.22) confirm a positive perception of Welsh speakers getting along better in the community in comparison to the population as a whole.
- The remaining demographic groups, given their proximity/closeness to the middle point (zero), are thought to have broadly similar experiences in respect to getting along in the community.

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

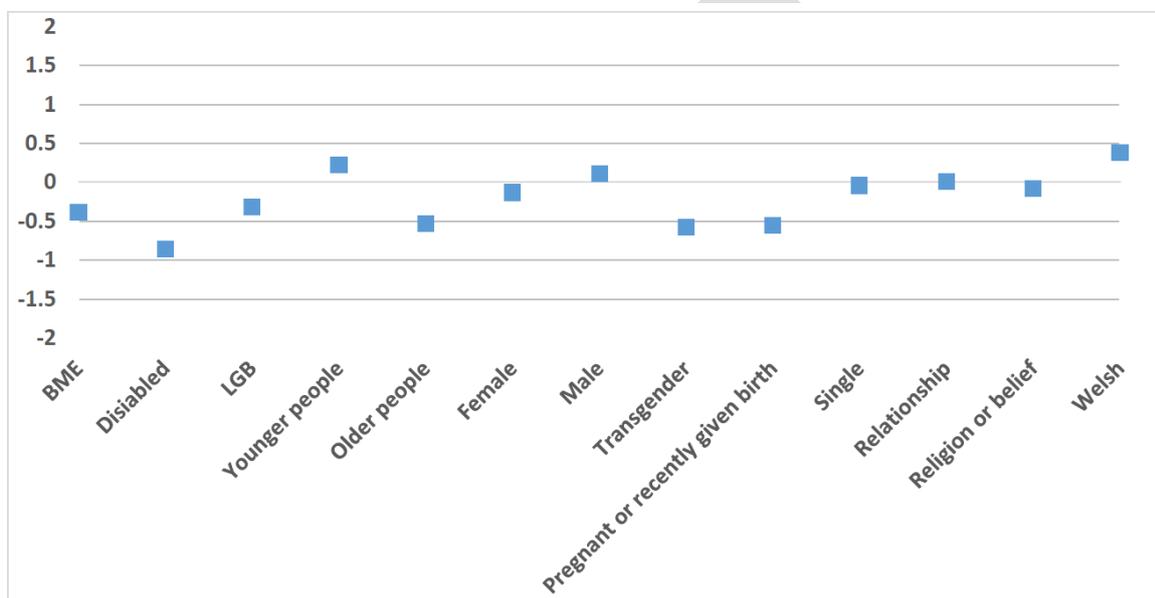
- I think Pembrokeshire offers a good standard of living and a very tolerant community
- Having lived in a small parish community since the 90's I am yet to feel the sense of community there once was (despite the efforts of the local community council). This is regardless of age, ethnic minority etc.
- We have wonderful communities in Pembrokeshire and I am aware of very little discrimination of any sort. We tend to help each other out.
- No notices given on local events
- I have been in Pembrokeshire 39 yrs. our community is the best in the world. So supportive,
- 'Low level' racism is commonplace, I was asked every working day for 3 years why 'I couldn't get a job over the bridge?' A disability is isolating in an already isolated county. Socialising costs, if you are single this can be restrictive. LGBTQ is a tiny part of a population that have very little available to them.
- Very isolated due to access
- The factors which affect people getting on together in a community are more to do with their background/social links rather than a particular characteristic.
- Some areas are non inclusive of non Welsh speakers
- Many disabled people find there are barriers to being in a community - transport etc., and are often isolated and alone. Young people have a sense of identity and do help each other.
- Poorly defined "community"
- Since moving to this area we have found there is a good community spirit, people are more friendly and helpful
- I think the notion of community has become more fragmented over the last 20 or 30 years, although some communities (like the GRT community) are very close knit and supportive. Generally I think older and younger people can feel isolated within rural communities and are less likely to mix. This can be exacerbated by a physical, sensory or learning disability, and/or by not having access to transport.
- I don't know about everyone, but our community is mixed and gets on well
- Mae llai o groeso (mewn mannau) i bobl o gefndiroedd ethnig gwahanol, pobl crefyddol megis moslemaid a phobl trawsrhywiol- dim diffyg ymdrech ar eu rhan nhw ond diffyg croeso a chyfleoedd iddynt.
- Discrete groups don't trust or like each other and don't mix.
- Difference does affect they response you get in some areas
- social media and media narratives have coloured people's perceptions of LGBTQ people, and of trans people in particular, which means they are

distrusted in the communities they inhabit and fear accessing those communities

Consideration for Impact Assessment

- Important to consider how projects can help promote positive experience of communities for all, including LGBT people, people from minority ethnic backgrounds and disabled people.
- Addressing issues of social isolation in rural areas, particularly for younger people, older people, disabled people and LGBT people.

Education



- As shown above, people's experiences of education are seen to vary considerably according to their demographic characteristic.
- Of all listed groups, disabled people (AIS of -0.86); transgender people (AIS of -0.58); Pregnant or recently given birth (AIS of -0.55) and older people (AIS of -0.53) were perceived to have particularly worse experiences of education in comparison to the population as a whole. It is also perceived that BME (AIS of -0.38) and LGB (AIS of -0.32) individuals have worse experiences of Education in comparison to the wider population.
- Welsh Speakers (AIS of 0.38); Younger people (AIS of 0.22) and Male respondents (AIS of 0.11) were perceived as having better experiences of health services in comparison to the population as a whole.
- Respondents consider the experiences of other demographic groups to be fairly similar to the population as a whole (AIS scores closely clustered around neutral 0 value)

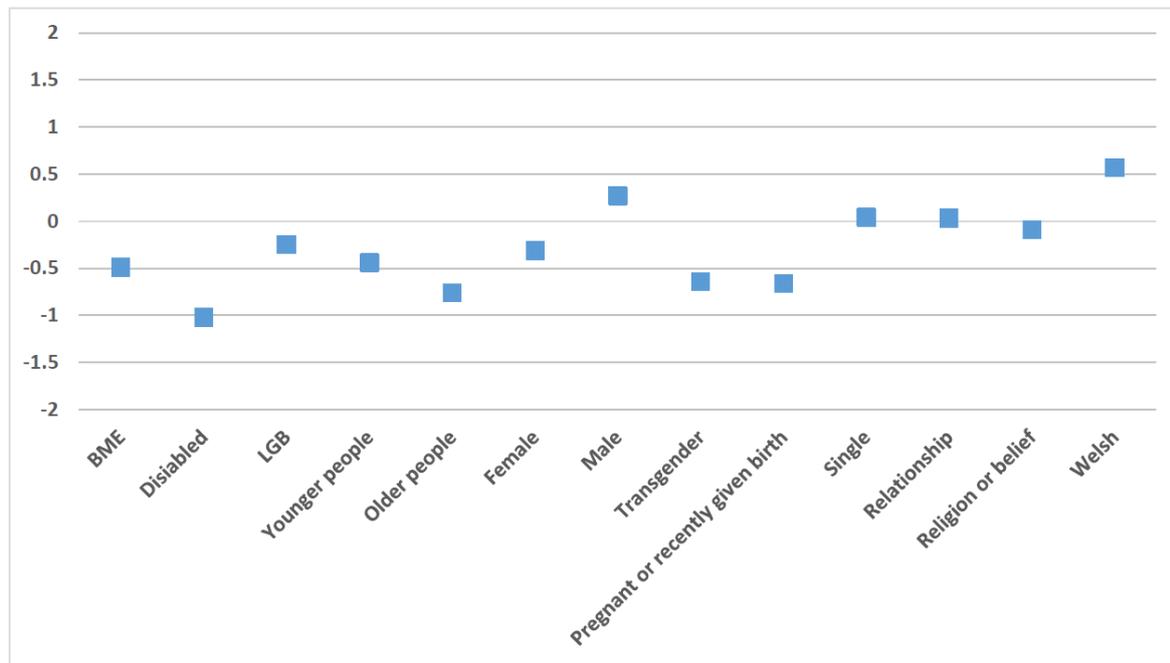
Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

- Wedi siomi bod hanes Cymru ddim yn cwriciwlwm addysg Cymru- angen mwy o ymdrech tuag at y iaith a'r addysg am hanes Cymru ar lefel ysgolion a addysg I bobl hyn hefyd e.g Mae pobl yn symud mewn in pentref mwyafrif cymraeg o loegr a methu siarad un gair or iaith na Gwybod dim am ein hanes. Angen pobl o bob oedran cael y siawns I ddysgu am ein hanes yn gronolegol a siawn I siarad ein hiaith hunafol ni.
- There is not enough done to support young people with different backgrounds or beliefs. As a gay man, in school I had an awful experience and that was only four years ago, the same can be said for being atheist when I was still forced to take part in collective worship. Pembrokeshire is very conservative in its views and tolerance is low f other views or beliefs.
- All people have same facilities on offer whether they are able to take advantage of what's on offer is a different matter ie disability transport to venues etc .
- Extremely poor services for people with ASD
- Pembrokeshire treats everyone equally
- Prejudice still disadvantages those from an ethnic minority, the disabled or being gay.
- People discriminate against and bully those because of what they don't understand themselves.
- Young people can be cruel. Those are discriminated against because they are different and people fear difference.
- In my experience I have not experience disadvantage from the education system, but I can't speak for other protected characteristics. With regard to disabled people I think there are pockets of good practice but also examples of the system failing them. It depends on the nature of the disability and where you live.
- Younger single people often have more time & opportunities. Older people struggle to travel, as do pregant & new mothers.
- Il feel people with disabilities done have full access to opportunities
- Extra attention and resources are given to Welsh speaking. People with disabilities are high profile in terms of allocation of resources. Anyone with gender or sexual orientation issues not valued and being a Christian is considered a disadvantage and not consideration or value is given to Christians although other minority religions have a high profile.
- Generally speaking educational organisations are well aware of equal opportunities legislation and try to meet accepted standards, however, some organisations do not have the financial resources to meet all the needs of those who are disabled or transgender.
- Disabled and Gypsy Travellers are normally educated in special provision which does not offer a full and diverse curriculum.
- Being Wales education is slanted towards Welsh speakers, facilities for disabled are often poor.
- Minority groups invariably have a worse experience of any education or training due to minority stress and unconscious bias from organisers and other students

Consideration for Impact Assessment:

- [Teaching people about Welsh Language and Local Heritage](#)
- [Ensuring inclusive education offer in terms of outdoor school provision and other opportunities in the park – issues re access and bullying](#)

Work



- [A person's demographic profile is perceived to profoundly impact their experiences of work](#)
- [As shown, individuals with certain demographic characteristics are considered to have particularly worse experiences of employment, primarily: those with a disability \(AIS of -1.02\); older people \(-0.76\) and pregnant women/those recently given birth \(-0.66\) and; Transgender people \(-0.64\).](#)
- [Younger people \(-0.44\), BME \(-0.49\), LGB \(-0.25\) and Females \(-0.31\) were also identified as having generally worse experiences of employment in comparison to the population as a whole](#)
- [An incongruence between male and female experiences of employment is also seen, with AISs of 0.27 and -0.31 respectively, denoting that females have significantly worse experiences in respect of employment.](#)
- [Single people, those in a relationship and individuals holding a religion or belief are deemed to have similar experiences to the population as a whole.](#)
- [It is perceived that Welsh speaking individuals have better experiences of work than the wider population \(0.57\).](#)

[Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:](#)

- [There is a lack of diversity and more so there is a view that young people are not able to undertake the job. That is my view as a young person in an old age dominated field and I know of others too. In terms of these disability,](#)

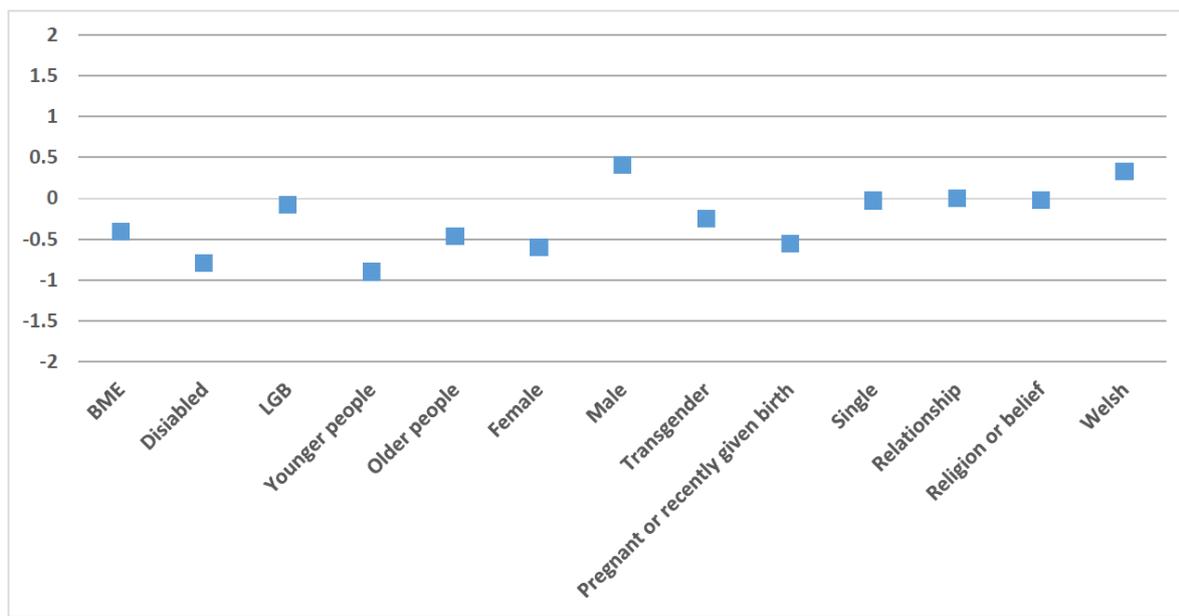
buildings such as the council offices have lifts which you cannot even turn a wheelchair around in or doors that you can open in a wheelchair, hardly a beacon of hope for those with disabilities.

- The main career path in Pembrokeshire is either retail or care so little opportunity for older people or those who are disabled.
- No jobs
- Only 16% of young people with ASD get full time employment..
- I'm often treated as if i'm Stupid because I'm disabled
- Some jobs don't suit people with disabilities. Some companies employ younger people because they are cheaper to pay and not older people because they are being trained for a short employment.
- Welsh speaking is often asked for in job adverts
- Those with wlesh language have additional opportunities or advantages in certain job markets.
- High childcare costs and lack of opportunities for disabled people
- Work is in short supply. It is badly paid, zero hour contracts still prevail. Unless you are white, male and have a good degree it is difficult to find good and enjoyable work. It is especially difficult if you are disabled. Even though it is 2019 men are still paid more than women, they get promoted sooner and they earn more.
- think disabled people are significantly disadvantaged when it comes to accessing employment opportunities.
- More difficult to access resources around the county due to lack of accessible public transport.
- Most recruitment (especially in the public sector) positively discriminates to favour Welsh language candidates. Pay inequality still persists.
- Poor job opportunities. Only 5 large employers in county. People give up trying. Some manage to build micro businesses.
- Those who are disabled and from ethnic minorities such as GT do not get the same opportunities as most probably due to the lack of education provision they have during their school career.

Consideration for Impact Assessment:

- Access to employment and training opportunities for disabled people
- Consideration of training opportunities.
- Nature of employment opportunities
- How to help people to develop Welsh Language Skills to increase employment opportunities
- Transport and access to child care

Rates of Pay



- As shown, Males (0.41) and Welsh speakers (0.33) are perceived to have better experiences of rates of pay in comparison to the wider population.
- As shown, individuals with certain demographic characteristics are considered to have particularly worse experiences of pay, primarily: Younger people (-0.90), those with a disability (AIS of -0.79); Females (-0.60) and pregnant women/those recently given birth (-0.55).
- Older people (-0.46), BME (-0.41), and transgender people (-0.25) were also identified as having generally worse experiences of pay in comparison to the population as a whole
- Again, there is an incongruence between male and female experiences of rates of pay, with AISs of 0.41 and -0.60 respectively, signifying that females have significantly worse experiences in respect to pay.
- Single people, those in a relationship, LGB and individuals holding a religion or belief are deemed to have similar experiences to the population as a whole indicated by AIS scores closely clustered around 0.

Comments from Pembrokeshire Survey responses relevant to the National Park Management Plan EQIA:

- Cyflogau pobl ifanc yn isel dros Ben ac eto yr genhedlaeth sydd fwyaf egniol a barod i weithio? Dylid cyflog fod yr un peth
- I believe pay rates nationally are lower than the average living costs but that certain groups of people see the bad side of this more. There is a pay gap with female employees compared to their male counterparts still but I also believe that speaking Welsh locally has an impact on wage as it is deemed to be advantageous for most roles now (regardless of whether it is really relevant to the role)
- Treated as if my worth is less in the workplace

- Younger people have a lower minimum wage. Being pregnant or just giving birth means you may be on maternity pay
- National legally enforceable rates give some level of reliability
- The minimum wage states your pay only youngsters under 18 are paid less men are paid more than women. The disabled find it harder to find work and then to be paid well.
- Young people get pretty poor pay.
- Less money for young people, I think some areas men do earn more than women
- As far as I am aware in my place of employment everyone has the same rates of pay depending on their pay banding
- I think men still enjoy higher rates of pay than women in certain careers. Disabled people generally earn significantly less than non-disabled people if they can access
- Minimum wage is much lower for younger people again, emphasis on supporting those who are under-represented in society
- Legislative requirements concerning minimum rate of pay should ensure that all people regardless of age, disability etc should receive equal pay for similar work.

Consideration for Impact Assessment:

- Access to employment with good rates of pay for young people
- Affordable Housing - Impact wages for young people may have on ability to access housing options

Stakeholder events

To meaningfully engage in dialogue with a wide range of stakeholders face-to-face, stakeholder events were held where possible. It was agreed to tailor the approach to each county, in accordance with local working relationships and resources.

Pembrokeshire County Council and Pembrokeshire Coast National Park Authority delivered stakeholder events to the following organisations in Pembrokeshire:

- Pembrokeshire 50+ Forum
- Young voices for Choices (Pembrokeshire) - Young people with additional learning needs
- Young People's Rights Forum – Pembrokeshire
- Pembrokeshire Youth Assembly
- Pembrokeshire Access Group
- VC Gallery - Disability (Mental Health)
- PCNPA Youth Rangers

Housing

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Young People's Rights Forum - Pembrokeshire:

- More affordable housing for 18 – 25 year olds

Pembrokeshire Youth Assembly:

- More disability friendly housing
- More allocated sites for the gypsy community

Pembrokeshire Access Group:

- When building new Council houses should be ensuring accessibility

PCNPA Youth Rangers (Young people):

- ALL live with parents, even those employed for years Can't afford rent let alone to buy

Consideration for Impact Assessment:

- Lack of accessible and suitable housing provision for disabled people
- Lack of affordable housing for young people
- Provision of allocated sites for Gypsy and Traveller communities

Access to Transport

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Pembrokeshire 50+ Forum:

- Keen to emphasise the importance of community transport. Living in a rural area becomes very difficult if you lose the ability to drive. Moving from rural area into town can be difficult, as property prices are often higher in towns

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- Bus timetables aren't flexible (not run on weekends)
- Disabled people should be able to access better transport, with better facilities
- Never had confidence to go travel on public transport alone before doing training with the forum
- Have not got the confidence to use public transport – parents provide transport
- Good support from mum and dad

Young People's Rights Forum - Pembrokeshire

- Not enough info on the NAFW Travel Scheme for 16 – 18 year olds
- Better requirements for disabled when it comes to suitable transport
- In some places there isn't transport for people with disabilities, such as wheelchair access
- More bus stops and more frequently
- Expensive transport and not a lot of links and times

Pembrokeshire Youth Assembly:

- Public transport shouldn't be cut
- There should be a discounted bus pass for young people not just the WG 16 -18 – this age group should be extended.
- The bus pass for over 60's needs to continue

Pembrokeshire Access Group:

- Pembrokeshire had lots of community transport schemes in place, which were not in place in other areas. Audio/visual displays on some of the main bus routes also helpful.
- Transport for multiple wheelchairs not really available – most designed to take just one.
- Insufficient wheelchair spaces on buses / trains generally – concern that you might be able to get somewhere but may not be space for you to make return journey.
- Felt that assistance on trains had generally improved.
- Felt that there had been an increase in the number of accessible taxis in Pembrokeshire but whether taxi companies would make them available at time / place you needed them was a different matter – bit hit and miss
- No experience of assistance dogs ever being refused in taxis in Pembrokeshire

VC Gallery - Disability (Mental Health):

- What positive if negative experiences of access to transport have participants had relating to their own protected characteristics? Bus services are poor. They cost a lot especially if I need regularly for work (MH) I only recently realised I was entitled to a bus pass (MH).
- What could improve above: Bus passes for those on low incomes Bookable buses might be a good idea if they work properly and are mainstreamed - current pilot is a good idea..

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of access to transport in their county - Worse

- REALLY unfair if you have no car. Transport is needed in Pembrokeshire for Health and wellbeing, exercise, leisure, social mobility, loneliness and isolation, Buses don't serve villages, don't run late enough, often enough for workers especially if not 9-5. If under 15 day explorer £4, over 15 £7.50. Costs more than London, but no jobs or money here (all Young people)

Consideration for Impact Assessment:

- Negative experiences for disabled people in terms of access to suitable accessible public transport and for some issues around feeling confident enough to use public transport options, however some improvement in areas such as provision of accessible taxis
- Negative experiences for new parents accessing public transport with buggies/ prams
- Broader issues relating to cost, frequency and timing of services for young, older and disabled people and those on low income
- Important role of community transport

Leisure and Access to the Coast and Countryside

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Pembrokeshire 50+ Forum:

- Infrastructure in communities is not always age-friendly. Benches in Haverfordwest town centre, for example, no backs / arm-rests etc. Mechanism in place to ensure consideration when designing / commissioning. Public toilets – didn't object to having to make a payment but it was inconvenient having to find correct change. Would like to see move to more changing places facilities.

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- Easy to use leisure centres, staff helpful
- Walking in the fresh air should be for everyone

Pembrokeshire Youth Assembly:

- Need more youth clubs
- More clubs
- No/little support in schools, support in also inconsistent
- No Youth Groups for LGBTQ+

Pembrokeshire Access Group:

- Should be aiming to have a stand-alone changing places toilet in every town in Pembrokeshire. Should be stand-alone rather than provided as part of another building, as being part of another building restricts access.
- Hydro-pool at Portfield School would be a good facilities for use outside of school (being heated anyway) but lack of funding was given as reason why this couldn't be made available.

VC Gallery - Disability (Mental Health):

- Do participants feel that different types of people have better or worse experiences of *leisure and access to the coast and countryside* in their county compared to the population as a whole? – Worse, need money to do either
- I rarely go to the countryside as all the carparks cost too much I don't go on organised trips outdoors with VC as I can't commit to something next week - my life is too up and down - If I commit I'll worry about it which will affect my MH more. I'm not sure of my limits so don't put myself in situations where I might go past them. I don't like it when people talk too much when we go out and about - I don't like hanging around People can learn to like the outdoors I find my MH condition tiring – can't get up early enough for trips] I get put off by having to do 'work' when go out with [staff member] sometimes. Timebanking has limited appeal and is too complicated. I don't feel confident to go off and spend time credits My frame of mind is so important - it can change in an instant - like the wind
- I'd go if (trusted individual) went - as I know and trust him. You could put on more short trips - not up for whole day I need to be in my comfort zone. Need to gradually build momentum and difficulty level. Start with 1-2 hrs I like learning activities like rockpooling. It would be good to have a really trusted person to take us out (I just about trust [staff member] now (maybe) after 18 months. Maybe I don't trust him, but would feel safe.... You should come in on more regular basis Going along to veterans meetings might be a good way to recruit more people It's usually a snap decision to go out, depends on my mood, I have an idea / decide from maybe 4-5 options

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of *leisure and access to the coast and countryside* in their county compared to the population as a whole? – Unfair, mostly related to travel - No Car , No fair, No life affects YP most, especially if poorer, or have No job. Vicious circle.
- Poppit rockets etc cheaper but not practical. Good for whole day circular walk etc but not commute etc. More for tourists
- Zero promotion of outdoors in schools. No field trips No NP info, Coast to Coast not visible
- Travel passes for YP.
- Schools forced to do much more about nature and outdoors, NP and how to get there.
- Much more NP Outreach in schools. Schools need to be more proactive and receptive.

- Outdoors is key to health and wellbeing. Gets people off screens, but need to be continuous from earlier age. Get to 16, you've lost people. Not just in curriculum, should be everywhere, all subjects and non-academic stuff.

Consideration for Impact Assessment:

- Age Friendly Communities including infrastructure like benches
- Provision of toilet and changing place facilities
- Positive benefit access to outdoors can have for young people. Lack of youth clubs. Ensuring services are inclusive for LGBTQ young people. Role of outdoor engagement in terms of schools.
- Transport issues for young people impacting on access
- Importance of engaging with people when developing projects to support areas relating to health and well-being in plan e.g. ensuring projects designed take into consideration varying needs of different service user in terms of their mental health and potential needs.
- Impact of cost for younger and disabled people in terms of transport and car parks

Health

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- Treated fairly with health, parents support
- At hospital, mum explains it to her not doctor but that's ok
- Doctors speak to parents rather than me
- Staff talk and they tell me
- I want the doctors to explain to us, use easy words that we can understand
- Doctors talk to me, not always in a way that I feel comfortable with
- Medical staff don't look at notes clearly
- Better support for patients with disabilities
- Since I've turned 18 transport to Cardiff hospital has become an issue
- Needs to be more access to mental health services for young people

Young People's Rights Forum - Pembrokeshire

- Not having enough money to look after yourself
- Not having transport to attend appointments
- No free hospital transport, clinics too far away
- Free healthcare but lack of nearby hospital
- Health care must be easy to access at all times, especially if serious incidents occur
- Not enough health services
- Lack of services for mental health in young people

- There are not enough support services for people with mental / physical disabilities – more services need to be accessible
- Mental health is taught with a stigma so you can't talk about it
- Can't ask for medical help because teenagers over-exaggerate
- Not knowing who to ask for help

Pembrokeshire Youth Assembly:

- GP times
- Need better emotional/mental health support for young people
- Need more information on where to get support
- Long waiting times
- Availability of doctors
- Better communication
- Should provide more sanitary products in toilets, should be cheaper as it's a necessity not a luxury
- Local services are being taken away
- Withybush cuts are worrying for local residents
- Feel like residents of West Wales are being short changed in terms of access to services

Pembrokeshire Access Group:

- Main issue was around communication with health workers.
- Audiology – when patients in waiting room, staff would come and call people for appointments – really needed audio / visual screen.
- Lack of provision for British Sign Language – example of young man who had been proscribed counselling but was having to attend appointments with his mother to act as his BSL interpreter.
- One member of the group said that, after years of asking, finally receive appointment information by email (which could be read by screen reader) rather than post, which hadn't been able to read.

VC Gallery - Disability (Mental Health): (Pembrokeshire)

- Do participants feel that different types of people have better or worse experiences of health in their county compared to the population as a whole? – Worse. Because: GPs are too stretched GPs would much rather work in the private sector
- What positive or negative experiences of health have participants had relating to their own protected characteristics?
- They didn't diagnose my MH issues well - I found them out myself really They didn't offer me help for my autism

Consideration for Impact Assessment:

- Access to transport as people are having to travel significant distances to access health services

- Meeting accessible communication needs of service users
- Positive impact health and well-being and social prescribing could have due to limited services available locally

Access to Care and Support

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Pembrokeshire 50+ Forum

- Elderly sometimes reluctant to seek help – feeling they are managing ok, however, need to be aware of risks – how quickly situations can change if there is an accident / injury – one partner becomes unable to care for another etc. Needs to be greater awareness of potential risks, how / where to seek help e.g. respite care – which is expensive and needs to be booked well in advance

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- People should have more access to care and support
- Need more knowledge on what's available

Young People's Rights Forum - Pembrokeshire

- Not a lot of support for LGBTQ+ community
- Reduction in services generally for young people
-

Pembrokeshire Youth Assembly:

- Social Services cut affects the elderly

Pembrokeshire Access Group

- Care and Support - Felt that this was limited by availability of funding

VC Gallery - Disability (Mental Health): (Pembrokeshire)

- Do participants feel that different types of people have better or worse experiences of access to care and support in their county compared to the population as a whole? – Worse

Consideration for Impact Assessment:

- Making sure people are aware of the health and well-being offers linked to the Park
- Impact of reduction of services on social isolation, role of health and well-being related

- Making sure health and well-being projects are LGBTQ friendly

Crime

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Young People's Rights Forum – Pembrokeshire:

- If young people misbehave we all get punished (e.g. banned from library)
- Shops have employees follow young people because they think we will steal
- Members of the public think it is young people committing the crimes
- Too many 999 prank calls, so teenagers calls are sometimes ignored
- Don't feel safe in certain areas
- We need to know and understand our rights

Pembrokeshire Youth Assembly:

- Crimes are blamed on young people
- Stereotyping against young people
- Certain areas are targeted
- Access to drugs
- Young people are seen drinking in public and causing anti-social behaviour – this is because there is lack of support and access to services for young people.
- The consequences for committing crime / anti-social behaviour should be harsher to prevent people reoffending
- Shoplifting, trespassing, drugs are some of the issues in our areas

Consideration for Impact Assessment:

- Developing project that benefit young people and promote intergenerational activities to break down miss perceptions

Influencing Decisions

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Pembrokeshire 50+ Forum

- Felt that public service bodies were engaging with them and asking for their opinions but didn't feel that these were always being listened to / acted upon.
- Didn't feel able to influence decisions being taken by private enterprises, such as banks etc.
- Would like more politicians (MPs / AMs) and representatives of public bodies to be more visible, to come and speak with older people directly

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs

- It is important that everyone has a say
- It is good to take part in groups so that people are included in decision-making and therefore builds their confidence
- It is important that young people can say what they think and people listen

Young People's Rights Forum - Pembrokeshire

- Access to Youth Councils to have a voice and links to decision makers
- Nobody listens to people they see as kids
- We can't participate because we are too young

Pembrokeshire Youth Assembly:

- Youth groups. Assemblies give the opportunity for young people to give them a voice and to be heard
- Young People's participation has improved but still as a long way to go. There should be more resources to support

VC Gallery - Disability (Mental Health):

- Do participants feel that different types of people have better or worse experiences of influencing decisions in their county compared to the population as a whole? – Worse, Services usually come and just tell us stuff, but they never stop and listen or act on what we say
- This conversation with [PCNPA staff member] is a great way to share our views

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of influencing decisions in their county compared to the population as a whole? – Worse, Digital connectivity patchy at best YP get put off - views not taken seriously by council / NP etc - and especially MPs Our views have less weight - decision makers are all much older

Consideration for Impact Assessment:

- Engaging diverse range of people in ongoing conversation about the Park
- Ensuring people's views are considered, explain clearly why something cannot be changed

Access to Information and Digital Services

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Pembrokeshire 50+ Forum

- Concern about move to have more and more services, including financial, being delivered online. Concern that branches of banks and post offices are closing, making it more difficult to deal in cash and / or necessitating older people having to travel further. Mobile banks – don't seem secure and won't accept cash in any case. Also making it more difficult for older people who act as treasurers / secretaries etc for community groups to continue supporting groups because of this. Grown up being taught to be careful with money and managing it in a particular way – facing a lot of changes, happening very quickly with no support / help to assist – having to rely on children and grandchildren for help. Getting online is also expensive, some simply can't afford it and there doesn't appear to be any grant funding available to assist. Also very real that conducting business online increases the risk of being scammed / ripped off. Felt very strongly that offering goods / services at a discount online is discriminating against those who are digitally excluded. Communication is expensive – cost of telephone calls, being online etc.

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- Texting
- More support needed to access digital services and information
- People are friendly and supportive, few aren't so good

Young People's Rights Forum - Pembrokeshire

- Easy-to-read information should be available for young people, which should mean accessing digitised services, would be a lot easier
- We need more information for young people to get their voices heard
- There's so much information – where do you go to get it? Which is right?

Pembrokeshire Youth Assembly:

- Services aren't well advertised so it's difficult to participate
- Slow internet – can affect socially or people find it difficult to work from home which it's unfair as it stops us accessing jobs
- Internet here is poor and going out of Pembrokeshire is like going into the future
- In a town it's easy to get internet but very difficult to get internet in rural areas

VC Gallery - Disability (Mental Health): (Pembrokeshire)

- Rural unemployed people can't access internet - costs a lot to have wifi etc.
- Library I use shuts early most days.

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of access to information and digital services in their county compared to the population as a whole? – Worse, Rurality Patchy connection. Can't afford hardware or ISPs etc

Consideration for Impact Assessment

- Ensuring information about the Park and engagement is accessible for all, consideration of how projects that only communicate digitally may impact on older people
- Access to facilities in the Park and broader issues relating to digital connectivity (broadband access)

Getting on Together in the Community

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Pembrokeshire 50+ Forum

- Felt that community relations in rural Pembrokeshire were generally good – there was familiarity and friendliness between generations. Initiatives such as Age-Friendly Communities and joint projects (e.g. painting chapel hall) were helpful

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- Drama, young farmers, sports clubs • Youth club, drama, youth forum and youth council
- Drama is great, gets me in a good mood – get transport
- I go to singing school and youth club, I like to join in
- More activities for young people to join in with
- Would like to know other ways of connecting in their community

Young People's Rights Forum - Pembrokeshire

- Community groups – need to be easier for people to take part in
- There aren't many things young people can get involved with in our community
- People should have more chances to voice their opinions and take part in vital decision making when in a community group

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of getting on together in a community in their county compared to the population as a whole? – Worse, Not much sense of community anywhere - people stay in houses No space for young people in communities, have little say Nowhere to hang out, get moved on People feel intimidated, but needlessly Youth clubs often viewed as 'dodgy', can be intimidating
- Milford Youth centre good, but not accessible for most - Miles from most places (transport issues again)
- Need more variety of YP spaces - not just skate parks. I don't like skating

Consideration for Impact Assessment

- Promoting intergenerational projects
- Projects aimed at young people, taking into account that young people are not a homogenous group and will have varied interests
- Provision of information about what is available

Education

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Young Voices for Choices (Pembrokeshire) - Young people with additional learning needs:

School – what works well?

- Portfield made freedom to do things independently
- I had support from my keyworker with all meetings
—Teachers are friendly

School – what could be better?

- Pupils more encouraged to be different
- Find out learning style
- More support is needed for people with ALN
- Open and more diverse to ensure that disabled students can join in with activities that able-bodied students

Opportunities after school – what could be better?

- More support needed for transition from school to college
- Other options, not just Pembrokeshire College
- Disabled people should have more of a chance to get to universities so that they can get the jobs that are best for them
- Young people with ALN need more support to achieve and be part of the community

Young People's Rights Forum – Pembrokeshire:

- Reduction in subject choices when it comes to options
- Young people need to be taught things that they need to know when they are an adult e.g. mortgage, banking, rights etc
- People aren't allowed to learn in the best way for them
- Classes should be set by attitude and ability
- Timetable should take advantage of concentration span

Pembrokeshire Youth Assembly:

- Great clubs
- Trips to help with future careers
- LGBTQ+ support is terrible
- Welsh Bac need to be improved
- We need more life skill lessons PSE at GCSE level
- Needs to have behaviour management in places so that people who want to learn can
- Bullying is an issue because it distracts people from learning and teachers do nothing, there should be more support.

Pembrokeshire Access Group

- Still not getting the basics right in terms of accessible buildings / toilets etc in schools – opportunities should be taken when new facilities being developed but not always the case.

VC Gallery - Disability (Mental Health): (Pembrokeshire)

- Think that different types of people have worse experiences of education in Pembrokeshire compared to population as a whole. Because: Pressure to achieve in school affecting mental health sufferers more. Cuts in support available (LSAs) affect those with disability more than the mainstream Teachers also negatively affected by pressure - leading to worse teaching.
- Teachers tended not to tackle the naughty kids which affected those with MH more - e.g. if bullied

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of education in their county compared to the population as a whole? - Generally same for all pupils, although those with ALN thought worse
- Dyslexia sufferers really struggle (support not good enough) (Youth / ALN) I did get too much support - college really steered me into things I didn't want e.g. Bridging course when I was capable of much more. This was to make sure they achieved the results THEY needed - ticking boxes - I kept insisting and eventually they let me do the Outdoor course I wanted (many others don't try so hard though) - Unless you are going to Uni schools are useless! - They are almost entirely geared up for that. - Too much focus on exams. Need more flexibility - Too much focus on a snapshot in time, my life changed and I didn't have the skills to deal

with it - The split between higher / lower ability is unfair, not enough effort to help all

- Schools need to have much more flexibility in the routes available - vocational, alternative curriculum for all Need more life skills - cooking, budgeting, housework, cleaning, parenting, enterprise, Running own business - more support needed e.g. LSAs. More publicity of people with additional learning needs - you can achieve but schools don't promote that. Greener job awareness and development. Not enough nature education - especially in secondary school.

Consideration for Impact Assessment:

- Ensuring inclusive education offer in terms of outdoor school provision and other opportunities in the park. Including looking at how sessions are delivered to make sure meet needs of range of pupils.
- Skills development and training opportunities

Work

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

Young voices for Choices (Pembrokeshire) – Young people with additional learning needs:

- Confidence building
- Great working with family friend
- Lack of paid opportunities
- People should have the opportunities when they go into the world of work. Employers should have the appropriate information for disabled people when they go into work
- Council should provide training opportunities
- Opportunities for young people to be taken on by PCC for work placements, leading to paid work

Young People's Rights Forum – Pembrokeshire

- Can't work under 14 or even volunteer
- Jobs are limited for young people
- Lack of opportunity to obtain experience
- Lack of job advertisements for young people
- Not knowing how to approach employers / managers for jobs
- Young people don't get enough support getting a job or getting into the world of work
- Employers say I need experience but won't give me a chance to get experience
- Students out of school find it difficult to find work as there may not be enough suitable jobs available
- Not having enough confidence e.g. calling in sick etc.
- They don't pay young people as much as other older employees

- Men and women don't get paid the same
- Not knowing our rights
- This generation have more pay and need more skills / qualifications for entry level positions than the older generation

Pembrokeshire Youth Assembly:

- Work opportunities can depend on your age and looks
- Seasonal jobs are only available - helps tourism
- People move to get better jobs
- Those with disabilities are not offered jobs – lack of support, they look more at the need ratio than the support
- There is a fear that if you are receiving benefits and get a job, if that job is short term the difficulty of getting your benefits back
- Not a lot of variety in jobs - typical tourist place
- More support for small business
- Not a lot of pay for people in apprenticeships locally
- People future plan's mainly include moving away because of jobs
- Pay is not always fair – equal pay
- To get a job people say you need experience. But no-one gives you a chance to get experience
- Young people find it harder to get jobs because the older generation has to stay in work longer
- Need to be 16 – with experience

Pembrokeshire Access Group:

- Still not getting the basics right in terms of accessible buildings / toilets etc in schools – opportunities should be taken when new facilities development but not always the case (e.g. new library in H/West – staff toilet facilities are upstairs and not accessible, so limits opportunities for people with disabilities to work there).
- When people with disabilities are given opportunity to work they show they can do a good job.
- People with disabilities lack confidence when applying for jobs – concern that facilities won't be accessible.
- Some people with disabilities feel they are not given the same opportunities to progress as non-disabled people.

VC Gallery - Disability (Mental Health): (Pembrokeshire)

- Do participants feel that different types of people have better or worse experiences of work in Pembrokeshire compared to the population as a whole? - Worse, because Organisations (e.g. the council) can be sneaky in how they manage employment- e.g. make competent people redundant and then re-employ others on less money due to technical points in contracts, or even just the temporary nature of posts. Recruitment process is harder for those with MH issues (compared to younger people) as filling forms etc requires skills they are not so current with as further from education Sometimes employers more likely to go for younger people as they have more productive years ahead of them

However also might employ older people as have more work experience and a better work ethic Knock on effects of MH issues make it harder for other employees e.g have to cover / absorb workload for those off with stress

- I have been discriminated in recruitment when they found I have had MH issues. They went for a 'lower risk' candidate (MH) Employers these days are pretty good at supporting those with MH issues eg stress when in a job, however don't employ fairly in the first place (MH) I cant find an apprenticeship - the need for skilled workers should drive this more (Young) Its hard for me to keep a job - employers take the easy route and try harder to hold onto 'normal' people (MH)
- More effort should be made to find out what skills people with different needs have and to get them suitable jobs People who are competent in jobs should automatically get to carry on if contract finishes and jobs readvertised Apprenticeships should be more available

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of work in Pembrokeshire compared to the population as a whole?- Generally same for all pupils, although those with ALN thought worse
- Often specs on JDs and person specs are unrealistic and disadvantage young people - e.g. HND in Tourism for seasonal jobs where you are just doing activities with kids or serving ice cream Requirements for welsh language are unfair - especially in Pembrokeshire where most residents and no tourists speak it.
- I did 3 years on apprenticeship, promised job. Got to end, nothing. Welsh requirements are unfair / not working If job is vocational Welsh requirement is unfair (Young people / English speakers generally, although one welsh speaker made many of the points about unfairness)
- Avoid welsh 'essential' and have desirable. Many more apprenticeships needed with reasonable pay .Guaranteed job after training / apprenticeship as long as you meet criteria

Consideration for Impact Assessment:

- Access to employment and training opportunities for disabled people
- Consideration of training opportunities.
- Nature of employment opportunities
- How to help people to develop Welsh Language Skills to increase employment opportunities
- Transport and access to child care

Income

Comments from stakeholder events relevant to the National Park Management Plan EQIA:

PCNPA Youth Rangers (Young people)

- Do participants feel that different types of people have better or worse experiences of rates and levels of pay in their county compared to the population

as a whole? – Worse, Pay rates for younger people (minimum wage for different age brackets) holds back equally skilled people

- Really poor pay for apprenticeships is unfair - adults doing EXACTLY the same would get 12k +
- More well paid apprenticeships

Consideration for Impact Assessment:

- Access to employment with good rates of pay for young people
- Affordable Housing - Impact wages for young people may have on ability to access housing options

DRAFT

ADVICE TO PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

Final Shadow Habitats Regulations
Assessment of the ~~Consultation draft~~
National Park Management Plan 2020-
2024

STATUS: DRAFT FOR COMMENT

Pembrokeshire Coast National Park Authority, 11TH DECEMBER 2019

BY
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1 Relevant background and introduction

1.1 Relevant background

1.1.1 Pembrokeshire Coast National Park Authority (PCNPA) is required to prepare a Management Plan for the National Park. The plan being developed covers the period from 2020-2024 and seeks to secure the National Park purposes through partnership action across five complementary themes as follows:

1. A national asset – A landscape for life and livelihoods
2. Landscapes for everyone – Well-being, enjoyment and discovery
3. A resilient Park – restoring biodiversity
4. A place of culture – celebrating heritage
5. Global responsibility – managing natural resources sustainably

1.1.2 For the purpose of an initial screening exercise under the Habitats Regulations, chapter 1 provides primarily background and contextual information. Chapters 2-6 then contain a series of policies under each of the theme headings above.

1.2 Habitats Regulations of plans generally

1.2.1 PCNPA is a competent authority under the Conservation of Habitats and Species Regulations 2017¹, commonly referred to as the Habitats Regulations. In accordance with Regulation 63 of those regulations, PCNPA must make an assessment of their Management Plan as a matter of law before it is put into effect². This assessment is generally referred to as a 'Habitats Regulations Assessment' or 'HRA' and the regulations set out a clearly defined step-wise process which must be followed.

1.2.2 Under the regulations, HRA is required in respect of both 'plans' and 'projects'. Where a project is subject to assessment, there is generally sufficiently detailed *project specific* information against which to make a comprehensive assessment. A plan based assessment is different; in most cases a plan is a strategic level document setting out broad intentions and often lacking the project specific details which may not be developed until after the plan has been published. Indeed, it is the plan itself which frequently steers the detail of the projects which it envisages. As such the HRA of a 'plan' is recognised to require a different approach to that of a 'project'.

1.2.3 In the case of the EC v UK³ the European Court of Justice (the ECJ) required the UK Government to secure the assessment of Britain's land use plans under the provisions of the Habitats Directive. In that judgment the Advocate General, and the Court itself, recognised that the assessment of plans had to be tailored to the stage in plan making.

¹ The Conservation of Habitats and Species Regulations 2017 SI No 1012 (replacing the 2010 Regulations and coming into force on 30th November 2017)

² Refer regulation 63

³ Case C-6/04: Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland judgment of the Court 20 October 2005.

- 1.2.4 The Advocate General's opinion⁴ which informed the judgment of the court acknowledged the difficulties associated with an assessment of a plan. In paragraph 49 of her opinion Advocate General Kokott stated that adverse effects:

'...must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.'

Consistently, in the UK High Court case of Feeney⁵ the judge said:

'Each appropriate assessment must be commensurate to the relative precision of the plans at any particular stage and no more. There does have to be an appropriate assessment at the [plan] stage, but such an assessment cannot do more than the level of detail of the [plan] at that stage permits.'

- 1.2.5 In undertaking plan based HRAs, it is therefore important to get the balance right; too severe an approach may be excessive. Caution is required, even adopting a precautionary approach, not to assign a 'likely significant effect' to policies and proposals that could not, realistically, have such an effect, because of their general nature. It is important to apply the precautionary principle in the 'likely significant effect test' in the Regulations, but the European Commission in its own guidance on the application of the test⁶, accepts that policies in a plan that are no more than general policy statements or which express the general political will of an authority cannot be likely to have a significant effect on a site.
- 1.2.6 To include such policies or general proposals in a formal 'appropriate assessment' is likely to generate a considerable amount of abortive or unnecessary work. It could even lead to the plan failing the 'integrity test'. Not because, in practice, any policy or proposal might adversely affect the integrity of any European site, but because policies have been 'screened in' which generate no more than theoretical risks, or vague or hypothetical effects, and for which no meaningful assessment can be made at this stage, because no particular significant effect on any particular European site can actually be identified. Such an approach is not believed to be in the interests of the plan or the European sites. In the Boggis judgment⁷, the Court of Appeal ruled that there should be "*credible evidence that there was a real, rather than a hypothetical, risk*". What the assessment needs to concentrate on are those aspects of the plan that could, realistically, be likely to have a significant effect.
- 1.2.7 Too lenient a view however can be equally problematic. Consequently, policies or proposals which could have a high potential for significant adverse effects on European sites should be removed from the plan, or policy-specific, or proposal-specific, mitigation measures must be introduced to the plan. This is in preference to a general protection policy which can, in the event of spatially specific policies create an internal conflict between plan policies, rather than avoiding the potentially significant effects.

⁴ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland

⁵ Sean Feeney v Oxford City Council and the Secretary of State CLG para 92 of the judgment dated 24 October 2011 Case No CO/3797/2011, Neutral Citation [2011] EWHC 2699 Admin

⁶ European Commission, 2000, *Managing Natura 2000 Sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC* section 4.3.2 at http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf

⁷ Peter Charles Boggis and Easton Bavants Conservation v Natural England and Waveney District Council, High Court of Justice Court of Appeal case C1/2009/0041/QBACF Citation No [2009] EWCA Civ. 1061 20th October 2009

1.3 The HRA approach

- 1.3.1 This HRA follows the guidance set out in *The Habitats Regulations Assessment Handbook*⁸ (hereafter referred to as 'The HRA Handbook'). Current subscribers to the Handbook include Natural Resources Wales and the Planning Inspectorate. The 'Practical Guidance for the Assessment of Plans under the Regulations' contained in Part F is considered to represent best practice as it is accepted by both these bodies as appropriate for their own staff to follow.
- 1.3.2 The process and method of assessment is summarised in the following three diagrams which are taken from the HRA Handbook. Figure 1.1 illustrates the statutory procedures required by the regulations. Figure 1.2 is an outline of the four stage approach to the HRA of plans; this report represents 'stage 1' in the diagram. Figure 1.3 illustrates how the HRA process is integrated into the plan making process.

⁸ Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook*, November 2017 edition UK: [DTA Publications Ltd.](#)

Figure 1.1: Procedures required by regulations 63 and 105 of the Habitats Regulations

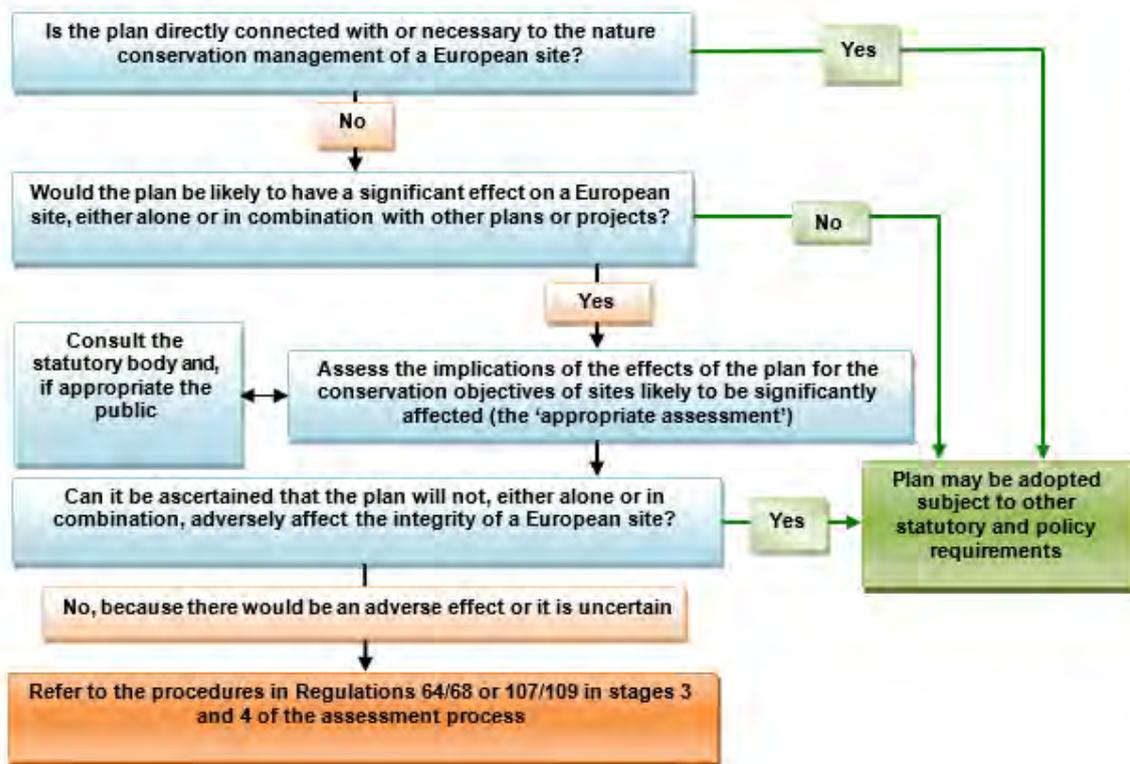


Figure 1.2

Outline of the four stage approach to the assessment of plans under the Habitats Regulations

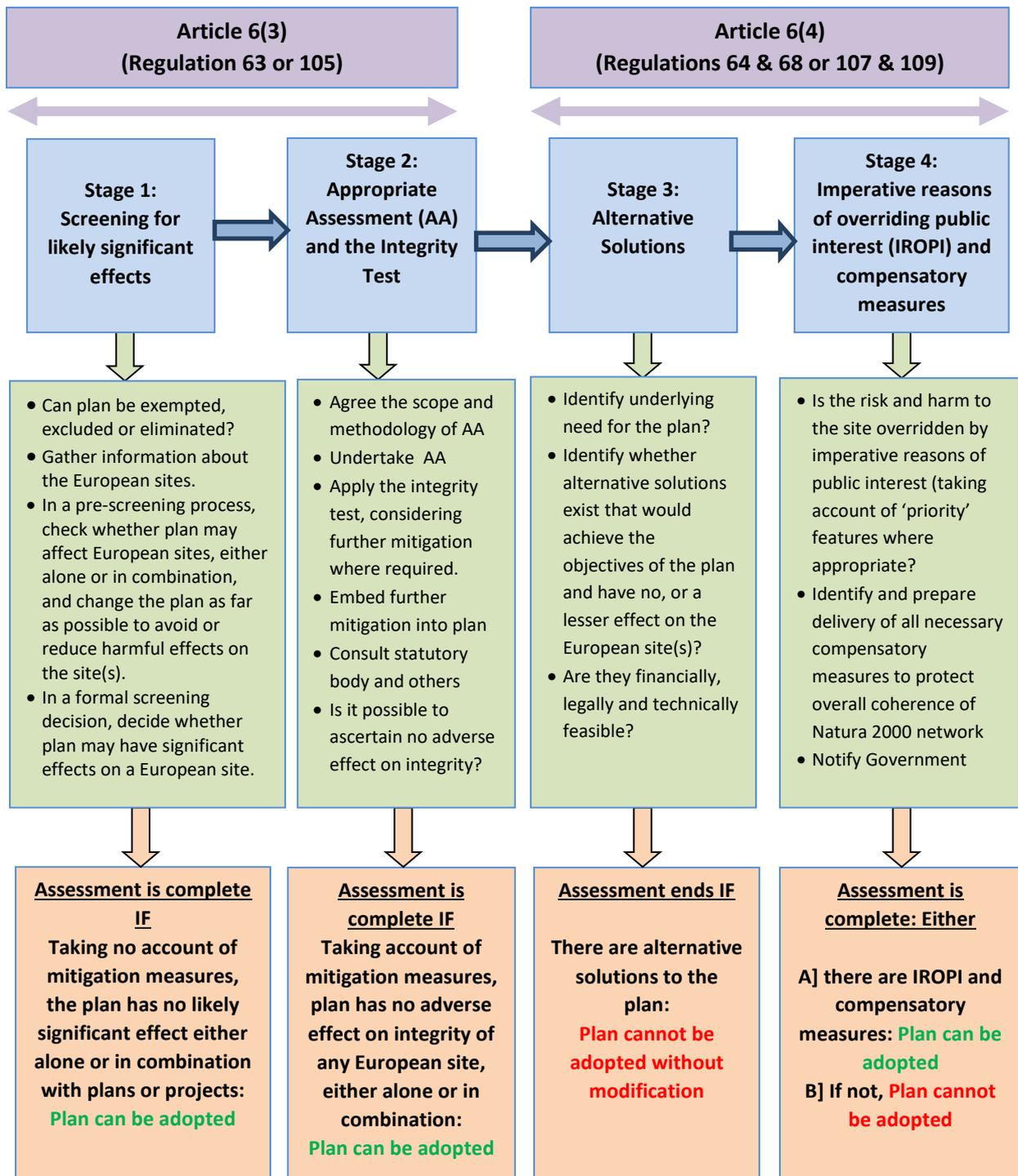
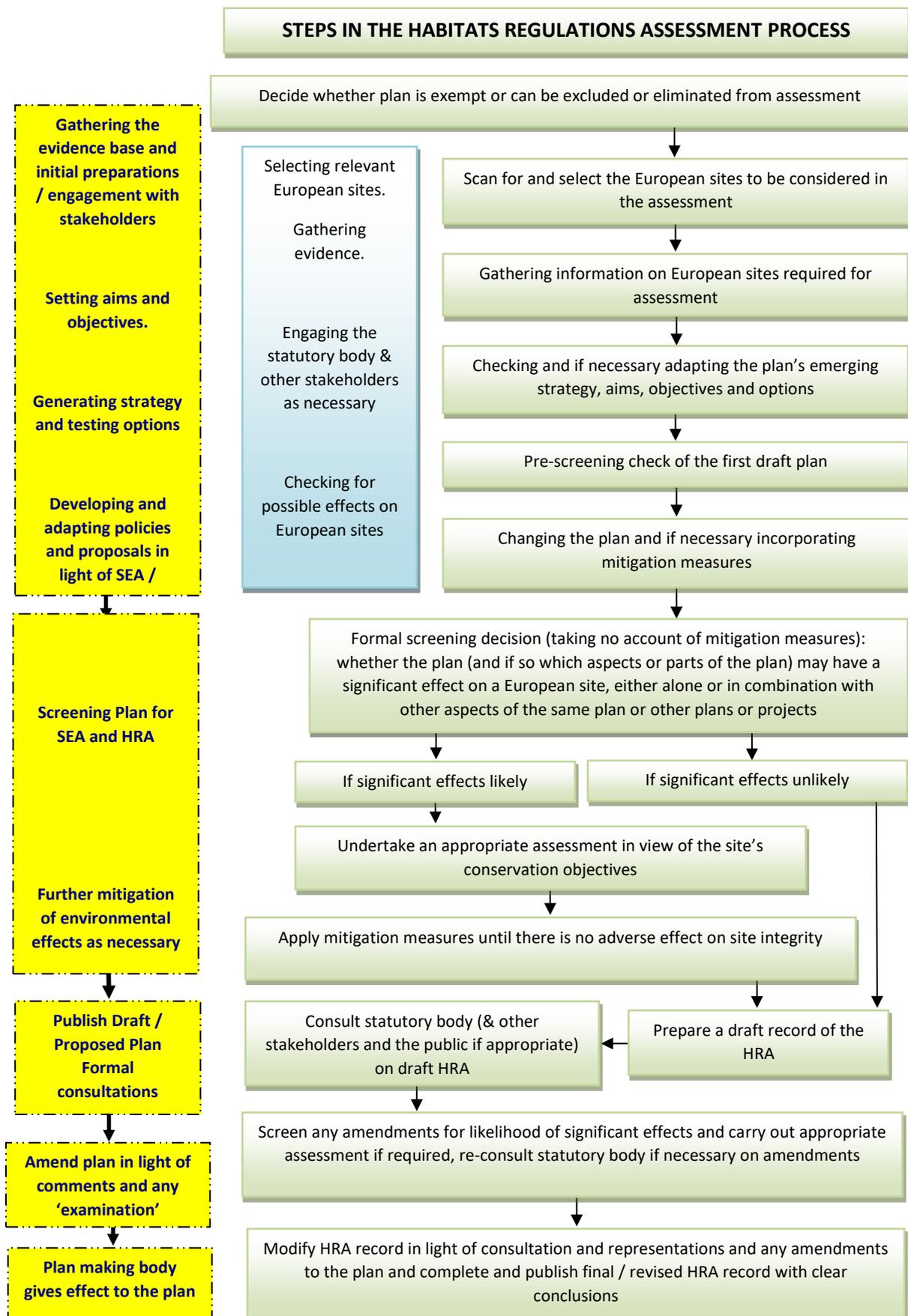


Figure 1.3: Relationship of steps in the Habitats Regulations Assessment with a typical plan making process



1.4 Scope of this assessment

- 1.4.1 This report is a *shadow* Habitats Regulations Assessment as required under regulation 63 of the Habitats Regulations. It is the responsibility of PCNPA as the competent authority to apply the specific legal tests and make the formal decisions which are required to be taken. This report sets out advice to PCNPA as to how a Habitats Regulations Assessment of the Management Plan might be completed. PCNPA, as the competent authority, are then able to adopt the conclusions and findings set out in this report, should they consider it appropriate to do so.

1.5 The Defra guidance on competent authority co-ordination

- 1.5.1 An important, but frequently overlooked, provision within the Habitats Regulations can be found at regulation 67 which reads as follows:

Co-ordination where more than one competent authority involved

67. (1) *This regulation applies where a plan or project—*
- (a) is undertaken by more than one competent authority;*
 - (b) requires the consent, permission or other authorisation of more than one competent authority; or*
 - (c) is undertaken by one or more competent authorities and requires the consent, permission or other authorisation of one or more other competent authorities.*
- (2) *Nothing in regulation 63(1) or 65(2) requires a competent authority to assess any implications of a plan or project which would be more appropriately assessed under that provision by another competent authority.*

- 1.5.2 In light of the significance of this provision for minimising duplication of assessment effort and increasing efficiency, Defra issued guidance on regulation 67⁹ (then regulation 65) under the provisions of 67(3); competent authorities are obliged to have regard to this guidance under the provisions of regulation 67(4). In the absence of equivalent guidance in Wales, the Welsh Government are supportive of the Defra guidance being relied on as best available information to satisfy the requirements of regulation 67.
- 1.5.3 It is recognised that, strictly speaking, the provisions of regulation 67 do not apply as a matter of law to the assessment requirements for this Management Plan Document, as it does not meet any of the three scenarios in regulation 67(1). However it is generally accepted¹⁰ that paragraphs 5-7 of the Defra guidance should be applied widely as a matter of good practice. Paragraph 4 of the guidance refers to two situations where competent authorities might 'co-ordinate' their assessment requirements. The first scenario is of relevance to the current HRA as it states that '*where previous decisions have been taken in relation to the appropriate assessment requirements for a plan or project, competent authorities should adopt the parts of the earlier assessment that are robust and have not become outdated by further information or developments*'.

⁹ [Defra guidance on competent authority co-ordination](#), July 2012

¹⁰ Refer section C.12 of The Habitats Regulations Assessment Handbook

1.5.4 Having introduced the concept of ‘adopting’ earlier decisions in order to ‘*simplify the assessment process and reduce its time and costs for both the applicant and the competent authorities involved*’¹¹, paragraphs 5-7 then provide specific further guidance on how and when a competent authority might adopt the reasoning or conclusions from an earlier assessment; they read as follows:

5. The Regulations transposing the Habitats Directive enable competent authorities to adopt the reasoning or conclusions of another competent authority as to whether a plan or project is likely to have a significant effect on a European site, or will adversely affect the integrity of a European site. They also provide that a competent authority is not required to assess any implications of a plan or project that would be more appropriately assessed by another competent authority’.

6. Competent authorities should adopt the reasoning, conclusion or assessment of another competent authority in relation to the appropriate assessment requirements for a plan or project, if they can. This can happen when all or part of the appropriate assessment requirements have already been met by another competent authority. It could also happen if one competent authority is completing all or part of the appropriate assessment requirements on behalf of others. Competent authorities remain responsible for ensuring their decisions are consistent with the Habitats Directive, so must be satisfied:

- No additional material information has emerged, such as new environmental evidence or changes or developments to the plan or project, that means the reasoning, conclusion or assessment they are adopting has become out of date*
- The analysis underpinning the reasoning, conclusion or assessment they are adopting is sufficiently rigorous and robust. This condition can be assumed to be met for a plan or project involving the consideration of technical matters if the reasoning, conclusion or assessment was undertaken or made by a competent authority with the necessary technical expertise.*

‘7. Due to these conditions there may be cases where it is not appropriate to adopt the reasoning, conclusions or assessment of another competent authority, or it is only appropriate to adopt some elements of an earlier assessment. In addition, even where the conditions are met, a competent authority may need to undertake additional work to supplement the assessment they have adopted in order to meet the full appropriate assessment requirements.’

1.5.5 The application and implications of the Defra guidance has been considered in detail within Part C12 of the HRA Handbook which refers to a ‘common sense’ approach at C.12.3 and states that:

‘In respect of ‘earlier decisions’ that relate to a separate plan or project, the competent authorities do not need to ‘coordinate’, because only one authority has a decision to take... However, the principles set out in the Defra statutory guidance, about adopting the reasoning and conclusions of another authority may be applicable and should be adopted as good practice. ‘Earlier decisions’ that relate to a separate plan or project could be separated by short, or relatively long, periods of

¹¹ Refer para 2 of the Defra guidance

time. The point is that the earlier decision is made before the later competent authority embarks on its assessment'

In the context of this assessment it is appropriate for PCNPA to 'adopt' the reasoning, conclusion or assessment of relevant earlier (or 'previous') HRA findings if they can.

Earlier relevant HRA assessments

HRA of the Pembrokeshire Coast National Park Authority Management Plan

1.5.6 PCNPA have also produced a HRA in respect of their 2009-2013 Management Plan¹², and took a proportionate approach to screening the 2015-2019 Management Plan¹³ (para 3.2.14 of the Management Plan). Where appropriate this assessment will seek to 'adopt' the assessment, reasoning or conclusions from this HRA work.

HRA of the current Local Plan

1.5.7 The current Local Development Plan was itself subject to HRA¹⁴ which concluded that the plan would have no adverse effect on the integrity of any European sites. Where appropriate therefore, this assessment 'adopts' the reasoning, assessment and conclusion of that earlier HRA in respect of any references made to it within this Management Plan on the basis that:

- No material information has emerged which would render the reasoning 'out of date', and
- The analysis underpinning the reasoning is sufficiently rigorous and robust

1.5.8 The Management Plan makes reference to Local Development Plan policies within policy L1, E1, H1, N1 and N3. **All references to the LDP within the Management Plan can be SCREENED OUT with reference to the earlier HRA findings/conclusions.**

¹² Habitats Regulations Assessment Screening Report PCNPA National Park Management Plan, Dec 2008

¹³

[http://www.pembrokeshirecoast.wales/Files/files/Management%20Plan/Final%20Management%20Plan%202015-19/National%20Park%20Management%20Plan%202015-2019%20\(Eng\)%20www.pdf](http://www.pembrokeshirecoast.wales/Files/files/Management%20Plan/Final%20Management%20Plan%202015-19/National%20Park%20Management%20Plan%202015-2019%20(Eng)%20www.pdf)

¹⁴ Shadow Habitats Regulations Assessment of the Local Development Plan – end date 2031 Consultation version (Sept 2018)

2 Identification of European sites potentially affected

2.1 Scanning and site selection

2.1.1 Twenty sites are initially identified for screening. The European sites for which effects which are considered to represent a credible risk, and which should therefore be considered as part of the preliminary screening, are those summarised in table 2.1 below.

Table 2.1 European Sites already identified in HRA of earlier plan	
European Sites within the Plan area	
1	Cardigan Bay SAC
2	Carmarthen Bay and Estuaries SAC/SPA/Ramsar
3	Castlemartin Coast SPA
4	Cleddau Rivers SAC
5	Gweunydd Blaencleddau SAC
6	Grassholm SPA
7	Limestone Coast of South West Wales SAC
8	North Pembrokeshire Woodlands SAC
9	North West Pembrokeshire Commons SAC
10	Pembrokeshire Bat Sites and Bosherton Lakes SAC
11	Pembrokeshire Marine SAC
12	Preseli SAC
13	Ramsey and St David's Peninsula Coast SPA
14	Skokholm and Skomer and the Seas off Pembrokeshire SPA
15	St David's SAC
16	West Wales Marine SAC
17	Bristol Channel Approaches SAC
European Sites beyond the Plan area	
18	Carmarthen Bay Dunes SAC
19	River Teifi SAC
20	Yerbeston Tops SAC

2.1.2 Information on the sites, their qualifying features and conservation objectives can be found within Appendix 1.

2.1.3 Having identified the sites that are within (or adjacent) to the Plan area, the next step is to identify the potential impact mechanisms through which the Plan might exert an influence over the sites identified, and hence identify which of the 20 sites need to be subject to further assessment. This is of particular importance where, as is the case here, a large number of sites have been identified within the Plan area. Part F.4.2 of the HRA Handbook recognises:

'...scanning for relevant sites potentially affected (and then selecting those which will need to be considered in respect of the plan's effects) is not always a straightforward process. It is important to ensure all sites potentially adversely affected are considered to a sufficient degree, but it is equally important to avoid unnecessary or excessive data gathering about sites that would either not be affected at all, or in respect of which there are only theoretical risks. This will help to keep the assessment proportional to the residual risk of significant effects.'

2.1.4 The HRA Handbook continues:

'It is acknowledged that in plan assessment or in considering options at an early stage the scanning and selection process may need to be quite 'coarse grained', due to the lack of information about the precise nature of what may be proposed in the plan and how it might affect the qualifying features.

As a general guide, and subject to case-by-case analysis by an ecological adviser, as necessary, the sites described in the Scanning and Site Selection List in Figure F.4.4 at the end of this section, are likely to be relevant. In almost all cases a scan of such sites will enable an appropriate 'short-list' of sites potentially affected to be drawn up, from which the final list of sites to be included in the assessment can be selected after considering the relevant information. Selection of the sites is an iterative process, considering and reconsidering information and effects as understanding and information improve, until there is a satisfactory degree of confidence that all sites potentially adversely affected have been selected....'

... If there is no causal connection or link between the plan's proposals and the site's qualifying features there cannot be an effect. If there is a 'theoretical' pathway, or 'hypothetical' cause, but in practice there is no credible evidence of a real rather than a hypothetical link to the site, it cannot be regarded as being potentially significant, either alone or in combination with other plans or projects. There is no point including that supposition in further assessment.'

2.1.5 It is therefore important, before embarking on a detailed assessment of all 20 sites listed above, to identify those sites where there is credible evidence of a real risk sites from the adoption of the Plan as currently drafted. Whilst there are many European sites within the Plan area, it may be fairly straightforward to exclude sites based on a common sense approach which recognises the credible evidence for real risks which are likely to arise in view of the sensitivity of the site and its qualifying features. This will help to focus later steps in the assessment and minimise unnecessary assessment effort.

2.1.6 Table 2.3 below is a completed 'scanning and site selection' list referred to in the extract of the HRA Handbook quoted above (figure F.4.4 of the Handbook) to inform this sifting process.

Table 2.3: Scanning and site selection list		
Types of plan	Sites to scan for and check	Names of sites selected
1. All plans (terrestrial, coastal and marine)	Sites within the geographic area covered by or intended to be relevant to the plan	Sites 1-17 from list above
2. Plans that could affect the aquatic environment	Sites upstream or downstream of the plan area in the case of river or estuary sites	N/A (not an effect anticipated to arise from the plan)
	Open water, peatland, fen, marsh and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area	N/A (not an effect anticipated to arise from the plan)

Table 2.3: Scanning and site selection list		
Types of plan	Sites to scan for and check	Names of sites selected
3. Plans that could affect the marine environment	Sites that could be affected by changes in water quality, currents or flows; or effects on the inter-tidal or sub-tidal areas or the sea bed, or marine species	N/A (effects on marine processes not anticipated to arise from the plan)
4. Plans that could affect the coast	Sites in the same coastal 'cell', or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes	N/A (no coastal process effects anticipated to arise from the plan)
5. Plans that could affect mobile species	Sites whose qualifying features include mobile species which may be affected by the plan irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected	Bristol Channel Approaches SAC Cardigan Bay SAC Cleddau Rivers SAC Carmarthen Bay & Estuaries SAC/SPA Castlemartin Coast SPA Grassholm SPA Limestone Coast of SW Wales SAC North Pembrokeshire Woodlands SAC Pembrokeshire Bat Sites and Bosherton Lakes SAC Pembrokeshire Marine SAC Ramsey and St David's Peninsula SPA Skomer, Skokholm and the Seas off Pembrokeshire Coast SPA West Wales Marine SAC
6. Plans that could increase recreational pressure on European sites potentially vulnerable or sensitive to such pressure	Such European sites in the plan area	Cardigan Bay SAC Cleddau Rivers SAC Carmarthen Bay & Estuaries SAC/SPA Castlemartin Coast SPA Grassholm SPA Limestone Coast of SW Wales SAC North Pembrokeshire Woodlands SAC Pembrokeshire Bat Sites and Bosherton Lakes SAC Pembrokeshire Marine SAC Ramsey and St David's Peninsula SPA Skomer, Skokholm and the Seas off Pembrokeshire Coast SPA
	Such European sites within an agreed zone of influence or other reasonable and evidence-based travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area	Carmarthen Bay Dunes SAC

Table 2.3: Scanning and site selection list		
Types of plan	Sites to scan for and check	Names of sites selected
	Such European sites within an agreed zone of influence or other evidence-based longer travel distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National Parks, coastal sites and sites in other major tourist or visitor destinations	None
7. Plans that would increase the amount of development	Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area	N/A (not an effect anticipated to arise from the plan)
	Sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving the plan area, irrespective of distance from the plan area	N/A (not an effect anticipated to arise from the plan)
	Sites that could be affected by the provision of new or extended transport or other infrastructure	N/A (not an effect anticipated to arise from the plan)
	Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic	N/A (not an effect anticipated to arise from the plan)
8. Plans for linear developments or infrastructure	Sites within a specified distance from the centre line of the proposed route (or alternative routes), the distance may be varied for differing types of site / qualifying features and in the absence of established good practice standards, distance(s) to be agreed by the statutory nature conservation body	N/A (not an effect anticipated to arise from the plan)
9. Plans that introduce new activities or new uses into the marine, coastal or terrestrial environment	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the new activities proposed by the plan	N/A (no such 'new' uses introduced by the Plan)
10. Plans that could change the nature, area, extent, intensity, density, timing or scale of existing activities or uses	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the changes to existing activities proposed by the plan	See 6 above
11. Plans that could change the quantity, quality, timing, treatment or mitigation of emissions or discharges to air, water or soil	Sites considered to have qualifying features potentially vulnerable or sensitive to the changes in emissions or discharges that could arise as a result of the plan	N/A (not an effect anticipated to arise from the plan)

Table 2.3: Scanning and site selection list		
Types of plan	Sites to scan for and check	Names of sites selected
12. Plans that could change the quantity, volume, timing, rate, or other characteristics of biological resources harvested, extracted or consumed	Sites whose qualifying features include the biological resources which the plan may affect, or whose qualifying features depend on the biological resources which the plan may affect, for example as prey species or supporting habitat or which may be disturbed by the harvesting, extraction or consumption	N/A (not an effect anticipated to arise from the plan)
13. Plans that could change the quantity, volume, timing, rate, or other characteristics of physical resources extracted or consumed	Sites whose qualifying features rely on the non-biological resources which the plan may affect, for example, as habitat or a physical environment on which habitat may develop or which may be disturbed by the extraction or consumption	N/A (not an effect anticipated to arise from the plan)
14. Plans which could introduce or increase, or alter the timing, nature or location of disturbance to species	Sites whose qualifying features are considered to be potentially sensitive to disturbance, for example as a result of noise, activity or movement, or the presence of disturbing features that could be brought about by the plan	Cardigan Bay SAC Cleddau Rivers SAC Carmarthen Bay & Estuaries SAC/SPA Castlemartin Coast SPA Grassholm SPA Limestone Coast of SW Wales SAC North Pembrokeshire Woodlands SAC Pembrokeshire Bat Sites and Bosherston Lakes SAC Pembrokeshire Marine SAC Ramsey and St David's Peninsula SPA Skomer, Skokholm and the Seas off Pembrokeshire Coast SPA
15. Plans which could introduce or increase or change the timing, nature or location of light or noise pollution	Sites whose qualifying features are considered to be potentially sensitive to the effects of changes in light or noise that could be brought about by the plan	TBC
16. Plans which could introduce or increase a potential cause of mortality of species	Sites whose qualifying features are considered to be potentially sensitive to the source of new or increased mortality that could be brought about by the plan	N/A (not an effect anticipated to arise from the plan)

2.1.7 The scanning and site selection table has identified six potential mechanisms through which the Plan might exert an influence over European sites which are summarised below.

Potential effects	Further comment
Effects on Mobile species	This recognises the potential for species to be impacted within land or sea out-with the boundary of a designated site, but functionally connected to the population for which the site has been designated.
Recreational pressure	This impact mechanism is directly related to changes in recreational activities and usage patterns.
Disturbance	This impact mechanism is directly related to changes in land use patterns.

3 Screening the Management Plan Document for a likelihood of significant effects

3.1 An introduction to screening

3.1.1 Having identified the sites which might potentially be affected by aspects of the Management Plan Document, the first stage in the HRA process is commonly referred to as the 'screening' stage.

3.1.2 'Screening' is not a term used in the Directive or Regulations but is widely used for convenience to describe the first step of the HRA process. The purpose of the screening stage is to consider each aspect of the Plan and identify whether it is:

- a) Exempt from the need for assessment (where a plan is directly connected with or necessary for the management of the European site concerned)
- b) Excluded from the need for assessment (where a document under consideration is not a 'plan' within the context of the Habitats Regulations)
- c) Eliminated from the need for assessment (where it is obvious from the beginning that there is no conceivable effect upon any European sites)
- d) Subject to assessment and screened out from further consideration (that is the case where an aspect of the plan is considered not 'likely to have a significant effect on a European site, either alone or in combination with other plans and projects')
- e) Subject to assessment and screened in for further assessment (that is the case where an aspect of the plan is considered 'likely to have a significant effect on a European site, either alone or in combination with other plans and projects')

3.1.3 For aspects of the Plan which are subject to assessment, the screening test requires a decision to be made as to whether that aspect of the Plan has a 'likely significant effect, either alone or in combination with other plans and projects', or not.

3.1.4 The HRA Handbook contains further guidance regarding this practical interpretation of this step, with reference to case law and government guidance. Section C.7.1 sets out a series of principles relevant to the screening decision; key extracts are set out below:

- *As a result of European case law in Waddenzee, irrespective of the normal English meaning of 'likely', in this statutory context a 'likely significant effect' is a possible significant effect; one whose occurrence cannot be excluded on the basis of objective information. In this context it is permissible to ask whether a plan or project 'may have a significant effect'...(principle 3)*
- *A significant effect is any effect that would undermine the conservation objectives for a European site... (principle 4)*
- *An effect which would not be significant can properly be described as : as 'insignificant effect'; or a 'de minimis effect; or a 'trivial effect'; or as having 'no appreciable effect'; but it is important to bear in mind that, in this context, all the terms are synonymous and are being used to describe effects which would not undermine the conservation objectives'....(principle 8)*

- *‘Objective’, in this context, means clear verifiable fact rather than subjective opinion. It will not normally be sufficient for an applicant merely to assert that the plan or project will not have an adverse effect on a site, nor will it be appropriate for a competent authority to rely on reassurances based on supposition or speculation. On the other hand, there should be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine the site’s conservation objectives. Any serious possibility of a risk that the conservation objectives might be undermined should trigger an ‘appropriate assessment’ (principle 11).*

3.2 Screening Chapter 1

3.2.1 Chapter 1 of the Management Plan is entirely comprised of introductory text and contextual information. These parts of the document are factual and not proposing any change *per se*, and cannot conceivably have any effects on a European site and are screened out of further assessment.

Table 3.1: Screening chapters 1 & 2 of the Plan		
Element of the Plan	Assessment and reasoning	Screening conclusion
Chapter 1: Welcome to Pembrokeshire Coast National Park	Administrative text	Screened out

3.3 Screening the Management Plan Policies

3.3.1 The Management Plan then continues in chapters 2-6 to set out 12 detailed policies under the 5 theme headings. In accordance with the approach adopted for this assessment (refer 1.3 above) a list of ‘screening categories’ have been used to provide a rigorous and transparent approach to the screening process. These categories are taken from Part F of the HRA Handbook and are as follows:

- A. General statement of policy / general aspiration (screened out).
- B. Policy listing general criteria for testing the acceptability / sustainability of proposals (screened out).
- C. Proposal referred to but not proposed by the plan (screened out).
- D. Plan-wide environmental protection / site safeguarding policy (screened out).
- E. Policies or proposals which steer change in such a way as to protect European sites from adverse effects (screened out).
- F. Policy that cannot lead to development or other change (screened out).
- G. Policy or proposal that could not have any conceivable effect on a site (screened out).
- H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out).
- I. Policy or proposal which may have a significant effect on a site alone (screened in)
- J. Policy or proposal with an effect on a site but unlikely to be significant alone, so need to check for likely significant effects in combination
- K. Policy or proposal unlikely to have a significant effect either alone or in combination (screened out after the in combination test).
- L. Policy or proposal which might be likely to have a significant effect in combination (screened in after the in combination test).

- M. Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on a European site (screened in)

3.3.2 All 12 policies were screened against these categories and detailed policy based conclusions are provided in table 3.1 below.

No	Policy	Screening category	Comment/justification	Further work?
A landscape for life and livelihoods				
L1	Conserve and enhance National Park Landscapes	A/C/G	<p>Screened out</p> <ul style="list-style-type: none"> • Policies L1(a) and (f) are general statements of policy • Policies L1(b) refers to the LDP and is screened out with reference to para 1.5.8 above. • Policy L1(c) refers to reducing visibility of infrastructure with reference to three specific schemes. The schemes referred to are all located outside of the boundaries of European sites and are considered in further detail at 3.4 below. They are strictly temporary schemes and will not have any conceivable effect upon any sites. • Policy L1(e) refers to another plan which is not proposed by this plan document. 	N
L2	Protect and enhance dark night skies	D	Screened out: A plan wide protection policy which will have no effect on any European sites.	N
L3	Protect and enhance natural soundscapes	A/C	Screened out: L3(a) is a general statement of policy. L3(b) refers to the LDP and is screened out with reference to para 1.5.8 above.	N
Well-being, enjoyment and discovery				
W1	Provide and promote sustainable outdoor recreation opportunities for all	I	This is a plan wide strategic policy promoting recreational activities. In the absence of any mitigation within the plan to ensure protection to European sites which are potentially sensitive to recreational pressure an internal conflict is created between the plan and the requirements of the Habitats Regulations. Likely to have a significant effect 'alone'.	Y

No	Policy	Screening category	Comment/justification	Further work?
W2	Provide and promote inspiring outdoor learning and personal development opportunities for all	I	This is a plan wide strategic policy promoting outdoor learning opportunities. In the absence of any mitigation within the plan to ensure protection to European sites which are potentially sensitive to disturbance an internal conflict is created between the plan and the requirements of the Habitats Regulations. Likely to have a significant effect 'alone'.	No
Protecting and restoring biodiversity				
E1	Protect and improve biodiversity quality, extent and connectivity at scale	D/M	Policies E1 (a-p) & E1(r) - Screened out: Plan wide environmental protection / safeguarding policy which will have no effect on any European sites. Policy E1(q) – Screened in: This policy is a mitigation measures which cannot be taken into account at screening, but can inform a later appropriate assessment.	Y
Celebrating heritage				
H1	Conserve and enhance landscapes of particular historic interest, scheduled monuments, listed buildings and their settings.	D	Screened out: A plan wide environmental protection / safeguarding policy which will have no effect on any European sites.	N
H2	Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape	A	Screened out: This is a general statement of policy	N
Managing natural resources sustainably				
N1	Contribute to a low carbon economy for Wales and adapt to climate change	A	Screened out: This is a general statement of policy	N
N2	Conserve and enhance water quality and restore water levels and natural flow regimes	D	Screened out: A plan wide environmental protection / safeguarding policy which will have no effect on any European sites.	N
N3	Conserve and enhance soils and natural carbon storage	D	Screened out: A plan wide environmental protection / safeguarding policy which will have no effect on any European sites.	N
N4	Protect air quality	D	Screened out: A plan wide environmental protection / safeguarding policy which will have no effect on any European sites.	N

3.4 Further assessment of policy L1(c)

3.4.1 Policy L1(c) promotes three proposals to reduce the visibility of overhead infrastructure through underground cabling at Newport Parrog, Great Castle Head and Marloes Sands. Further details regarding these schemes are provided below:

Fig 3.4.1. Newport Parrog scheme

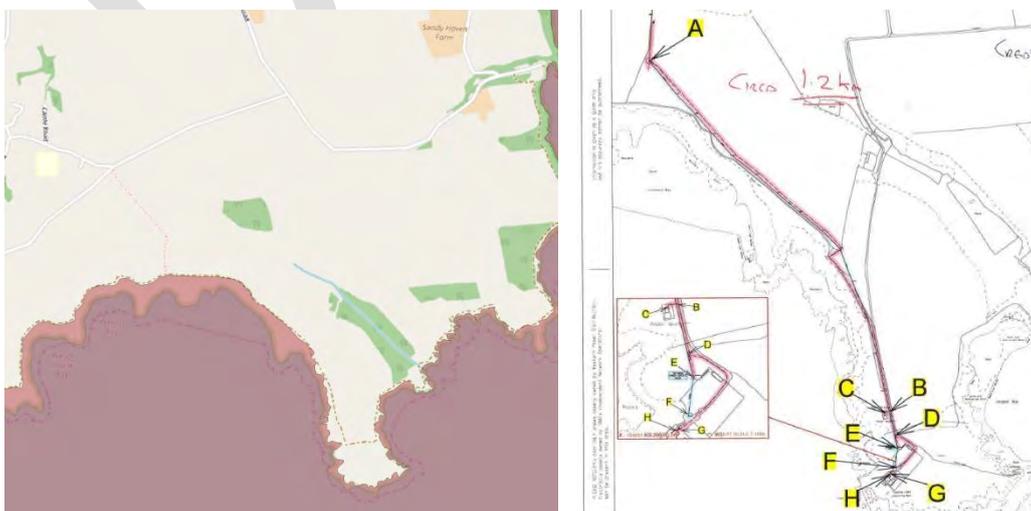


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3.4.2 This scheme extends for 400m and is located entirely within the residential area of Newport Parrog running along Parrog Road. The effects from the scheme will be temporary in nature. The West Wales Marine SAC is located 500m from the proposed scheme and is designated for harbour porpoise. It is inconceivable that the effects from the scheme will have any effect upon the qualifying features for the SAC, given the nature and scale of the works.

3.4.3 The scheme location is 1.5km from the Pembrokeshire Bat Sites and Bosherton Lakes. The temporary nature of the scheme and the siting within a residential street means that, again, it is inconceivable that the effects from the scheme will have any effect upon the qualifying features for which the SAC has been designated.

Fig 3.4.2 Great Castle Head Scheme

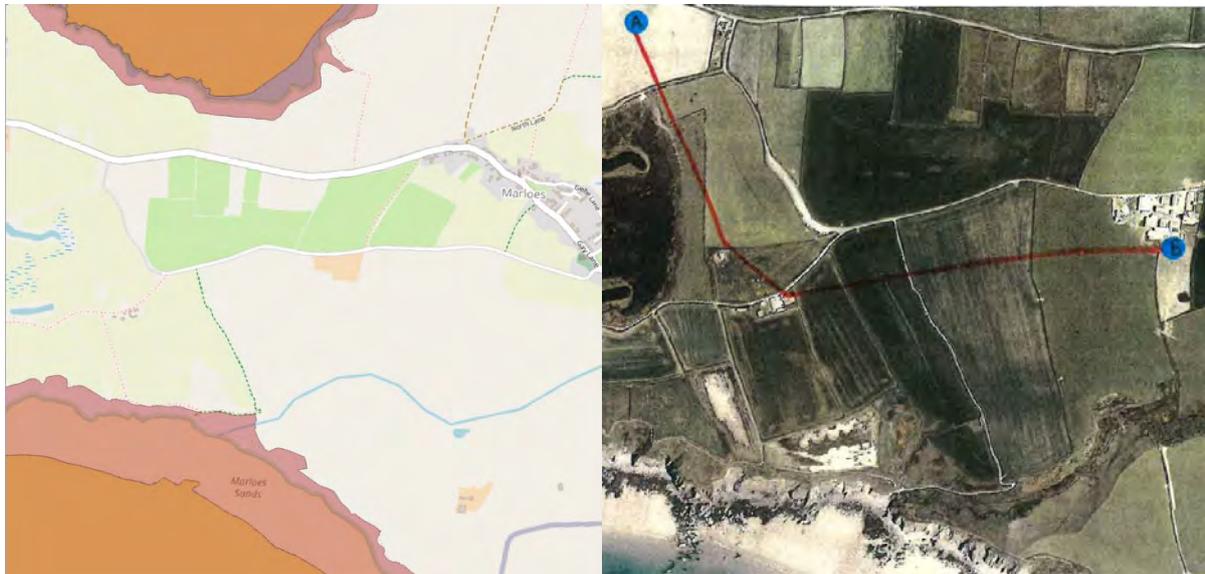


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3.4.4 This scheme extends

for approximately 1.2km across agricultural fields located at the top of cliffs which form the boundary of the Pembrokeshire Marine SAC and the West Wales Marine SAC. The scheme will be temporary in nature and the physical barrier provided by the cliff face means that effects upon the qualifying features for which the sites have been designated are inconceivable.

Fig 3.4.3 Marloes Sands Scheme



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3.4.5 The Marloes scheme extends for approximately 1.3km across agricultural fields to the southwest of Marloes. The scheme is located on the peninsula and the boundaries of the Skokholm and Skomer SPA, the Pembrokeshire Marine SAC and the West Wales Marine SAC are located some 600m to the north and 350m to the south at the bottom of the cliffs. The scheme will be temporary in nature and the distance from the designated site boundaries together with the physical barrier provided by the cliff faces means that effects upon the qualifying features for which the sites have been designated are inconceivable.

3.4.6 Having considered the three schemes, it is the conclusion of this HRA that policy L1(c) can be screened out as having no likely significant effects. They will have no conceivable effects upon the qualifying features for any European sites.

3.5 Screening conclusions

3.5.1 Having screened the plan policies against the screening categories from the HRA Handbook all policies have been screened out of the need for further assessment with the exception of policies W1 and W2 which are taken forward to an appropriate assessment.

4 Appropriate Assessment

4.1 The appropriate assessment and applying the integrity test

- 4.1.1 The purpose of an appropriate assessment is to ensure that, prior to the plan being implemented, a judgment can be made as to whether it can be ascertained that the plan would have no adverse effect on the integrity of any European sites (the integrity test).
- 4.1.2 The sole reason that this plan has progressed through to an appropriate assessment is the screening work identified that, without taking account of any specific policy protection within the plan for European sites, 2 policies were identified as having a likely significant effect. The formal screening recognised policy E1(q) as being a 'mitigation measure' which, following the ruling in *People Over Wind*, could not be taken into account. As such, this new policy (and the 2 policies which might rely on it to avoid harmful effects on European sites) were progressed through to an appropriate assessment.
- 4.1.3 The implications of policy E1(q) can now be taken into account as part of this appropriate assessment which. Taking full account of the European site protection policy, table 4.2 below sets out the integrity test conclusions for new policy and the 2 policies identified as having a likely significant effect.

4.2 Appropriate Assessment of Policies W1 and W2

- 4.2.1 Policies W1 and W2 provide for and promote sustainable outdoor recreation and learning opportunities. In principle there is scope therefore for this policy to result in potential pressures upon European sites which are identified in table 2.3 against recreational pressure and disturbance. These sites are listed below for ease of reference:
 - Cardigan Bay SAC
 - Cleddau Rivers SAC
 - Carmarthen Bay & Estuaries SAC/SPA
 - Castlemartin Coast SPA
 - Grassholm SPA
 - Limestone Coast of SW Wales SAC
 - North Pembrokeshire Woodlands SAC
 - Pembrokeshire Bat Sites and Bosherton Lakes SAC
 - Pembrokeshire Marine SAC
 - Ramsey and St David's Peninsula SPA
 - Skomer, Skokholm and the Seas off Pembrokeshire Coast SPA
- 4.2.2 All these sites are potentially sensitive to recreational pressure/disturbance and broad policy support to promote *all* such activities, without recognising any restrictions that might need to be imposed for European sites carries associated risks. In accordance with the Habitats Regulations an effect is 'likely' if it *undermines the conservation objectives*'; it is therefore necessary to be satisfied that the implementation of policies W1 and W2 will not result in any such objectives being so *undermined*.
- 4.2.3 Policies W1 and W2 are not spatially specific and they apply to the National Park, as a whole. Generally speaking policy support for promoting sustainable recreational opportunities is a central part of the National Parks objectives and the requirements of the Habitats

Regulations should not prevent such objectives being met. However in the absence of any geographic specificity, hypothetically speaking, it might be argued that the Plan supports all such activities irrespective of any conflict that may arise with the achievement of the conservation objectives for European sites.

- 4.2.4 In this regard it is therefore necessary to consider whether the policy recognises these risks and whether the plan itself provides sufficient confidence that they will not arise. Where other policies might be relied upon to address such risks these can correctly be taken into account if they have been clearly referred to within WP1 itself.
- 4.2.5 W1(f) explicitly recognises the need to manage potential *and* actual recreational pressures and capacity issues. This is important; if this management commitment can be relied upon to provide objective information upon which potential risks which might otherwise undermine the conservation objectives of European sites can be excluded, the policy will have resolved any conflict that might otherwise arise in respect of European sites.
- 4.2.6 It is therefore necessary to consider whether the plan itself provides a mechanism through which the protection to European sites from inappropriate implementation of these policies through these management commitments might be secured.

Table 4.1: Applying the integrity test to the new policy and the 20 policies identified at screening as having a likely significant effect

	Policy	Integrity test conclusion and justification
Policy E1(q)	Resist proposals which have a likely significant effect (either alone or in combination with other plans and projects) upon a European site unless it can be ascertained following an appropriate assessment that they will have no significant adverse effect on the integrity of the site(s) concerned.	No adverse effect on integrity. This is a plan wide policy incorporated into the plan with the sole intention of providing protection to European sites in a manner which ensures that adverse effects to site integrity will be avoided.
W1	Provide and promote sustainable outdoor recreation opportunities for all.	No adverse effect on integrity. This is a plan wide strategic policy, 11 European have been identified as potentially sensitive to recreational pressure/disturbance. An overarching strategic policy promoting recreational opportunities risked presenting a potential conflict between the plan and the requirements of the Habitats Regulations. However the European site protection policy can be relied upon to ensure that proposals coming forward under this policy will not have an adverse effect on the integrity of any European sites.
W2	Provide and promote inspiring outdoor learning and personal development opportunities	No adverse effect on integrity. This is a plan wide strategic policy, 11 European have been identified as potentially sensitive to recreational pressure/disturbance. An overarching strategic policy promoting outdoor learning opportunities risked presenting a potential conflict between the plan and the requirements of the Habitats Regulations. However the European site protection policy can be relied upon to ensure that proposals coming forward under this policy will not have an adverse effect on the integrity of any European sites.

4.2.7 In assessing the potential impacts associated with recreational activities, it is also important to recognise the status of the National Park itself. In carrying out its statutory duties, PCNPA must have regard to their statutory responsibilities and management role as a National Park Authority. The Environment Act 1995 establishes two statutory purposes for National Parks in England and Wales which provide an over-arching umbrella under which all other responsibilities are delivered¹⁵. These are to:

- a) Conserve and enhance the natural beauty, wildlife and cultural heritage
- b) Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public

Any irreconcilable conflict in respect of these two purposes should be resolved in favour of the purpose to conserve and enhance the natural beauty, wildlife and cultural heritage¹⁶. As a National Park authority PCNPA should also seek to foster the economic and social well-being of local communities within the Park in pursuance of these two purposes¹⁷.

4.2.8 The National Park is a heavily managed resource. Authority staff are familiar with balancing the enjoyment of the Park by visitors with the overarching purpose to protect and conserve the special features of the Park. **The level of involvement by Park Authority staff with the way that the Park is utilised, together with their experience in managing visitor pressure provides the objective information upon which effects which might otherwise undermine the conservation objectives for a European site (and hence be 'significant') can be excluded. There is no credible evidence of a real risk from policies W1 and W2 in light of the protection afforded through policy E1(q).**

4.2.9 With the inclusion of the European site protection policy E1(q), it is possible to conclude, that the policy itself, and the 2 plan policies which rely upon it, will have no adverse effect on the integrity of any European site. The plan wide policy protection afforded to European sites ensures that wider proposals coming forward under other plan policies cannot result in any adverse effects to the integrity of any European sites.

4.2.10 In reaching this conclusion regard has been given to section C.5 of the HRA Handbook and the principles which should be applied to the consideration of 'mitigation measures' within the framework of an appropriate assessment. Principle 5 in section C.5.1 reads as follows:

'To be taken fully into account, at the appropriate stages, all 'mitigation measures' should be effective, reliable, timely, guaranteed to be delivered and as long term as they need to be to achieve their objectives'

4.2.11 With reference to this principle the plan-wide European site policy E1(q) will be *effective* as all proposals coming forward under the plan will be required to demonstrate compliance with it. It is *reliable* as it is explicit in the protection afforded to all European sites. It is *timely and guaranteed to be delivered* as it has been incorporated into the plan itself; it will therefore be effective for the entire plan period.

4.2.12 It is therefore **the conclusion of this HRA that, with reference to the European Site protection policy, the draft management plan will have no adverse effect on the integrity of any European sites.**

¹⁵ Refer Section 61 of the Environment Act 1995

¹⁶ Refer section 62 (11A(2)) of the Environment Act 1995

¹⁷ Refer section 62 (11A(1)) of the Environment Act 1995

4.3 The need for further assessment in combination with other plans and projects

- 4.3.1 Following initial screening 10 policies were screened out against categories which conclude no likely significant effect either alone or in combinations. This is on the basis that the policies will have no effects (or no conceivable effects) *at all* and such policies cannot therefore act in combination with other plans and projects meaning no in combination assessment work is required.
- 4.3.2 This appropriate assessment has concluded that, on the basis of the incorporated plan-wide European site policy E1(q), the Management Plan will have no adverse effect on the integrity of any European sites. The plan wide nature of this policy is such that its incorporation into the plan was not required to address any specific adverse effect that was predicted to arise. Instead it provides a precautionary approach to ensure that the implementation of the generic plan wide policies within the plan will not, inadvertently, result in any unforeseen harmful effects to European sites.
- 4.3.3 As recognised at section 1.2 above, the inherent nature of a plan will necessarily limit the extent to which its effects can be subject to assessment under the Habitats Regulations. In this regard, the Advocate General’s opinion in case C-6/04¹⁸ acknowledged the difficulties associated with an assessment of a plan. In paragraph 49 of her opinion Advocate General Kokott stated that adverse effects:
- ‘...must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.’*
- Consistently, in the UK High Court case of Feeney¹⁹ the judge said:
- ‘Each appropriate assessment must be commensurate to the relative precision of the plans at any particular stage and no more. There does have to be an appropriate assessment at the Core Strategy stage, but such an assessment cannot do more than the level of detail of the strategy at that stage permits.’*
- 4.3.4 This assessment has identified the potential for adverse effects from the management plan and has mitigation measures incorporated into the plan itself with a view to avoiding such effects.
- 4.3.5 The potential for in combination effects to arise with other plans and projects cannot be subject to any meaningful assessment at this stage, as there is no information as to where within the plan area the proposals provided for under the general plan wide policies will come forwards. The new European site policy explicitly requires assessment ‘either alone or in combination with other plans and projects’ as such the potential for in combination effects will be subject to assessment as necessary when any proposals come forwards under the plan which might have a likely significant effect on a European site. On the basis of the precision of the plan at this stage, in the absence of any information as to where within the National Park potentially damaging proposals might come forwards, in combination effects are taken into account and excluded on the basis of insufficient information and a lack of credibility as to any real risks.

¹⁸ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland

¹⁹ Sean Feeney v Oxford City Council and the Secretary of State CLG para 92 of the judgment dated 24 October 2011 Case No CO/3797/2011, Neutral Citation [2011] EWHC 2699 Admin

5 Conclusions

5.1 Overall conclusion

- 5.1.1 The Management Plan has been subject to screening under the Habitats Regulations. All policies have been considered in respect of the potential for likely significant effects upon any European site from the document, either alone or in combination with other plans and projects.
- 5.1.2 Following a preliminary screening, 10 policies were screened as having no likely significant effect, either alone or in combination and 2 policies were identified as having a potential likely significant effect 'alone'. One policy E1(q) was recognised as a 'mitigation measures' and was not taken into account at screening.
- 5.1.3 When the mitigation policy E1(q) was taken into account as part of the appropriate assessment it was possible to ascertain that the plan would have no adverse effect on the integrity of any European sites.
- 5.1.4 This outcome is not surprising given:
- The statutory purpose of the National Park and its Management Plan
 - The statutory obligations of the National Park Authority
 - The low level of development expected and provided for in the National Park; and
 - The exceptionally high development management standards applied by the National Park Authority

Appendix 1: European sites and qualifying features

European Sites *	SAC habitat features	SAC species features	SPA features
Within plan area			
Bristol Channel Approaches SAC		Harbour porpoise	
Cardigan Bay SAC	Sandbanks which are slightly covered by seawater at all times Reefs Submerged or partially submerged sea caves	Bottlenose dolphin Sea lamprey River lamprey Grey seal	
Carmarthen Bay and Estuaries SAC/SPA/Ramsar	Sandbanks which are slightly covered by seawater at all times Estuaries Mudflats and sandflats not covered by seawater at low tide Large shallow inlets and bays Salicornia and other annuals colonizing mud and sand Atlantic salt meadows	Twaite shad Sea lamprey River lamprey Allis shad Otter	
Castlemartin Coast SPA			Pyrrhocorax pyrrhocorax (Chough)
Cleddau Rivers SAC	Watercourses of plain to montane levels with Ranunculus and Callitricho vegetation Active Raised bogs Alluvial forests with Alnus glutinosa and Fraxinus excelsior	Brook lamprey River lamprey Bullhead Otter	
Gweunydd Blaencleddau SAC	North Atlantic wet heaths with Erica tetralix Molinia meadows on calcareous, peaty or clay laden soils Blanket bogs Transition mires and quaking bogs Alkaline fens	Marsh fritillary butterfly Southern damselfly	
Grassholm SPA			Morus bassanus (Gannet)
Limestone Coast of South West Wales SAC	Vegetated sea cliffs of the atlantic and Baltic coasts Fixed coastal dunes with herbaceous vegetation ("grey dunes")* European dry heaths Semi-natural dry grassland and scrubland facies on calcareous substrate Caves not open to the public	Greater horseshoe bat Early gentian Petalwort	

European Sites *	SAC habitat features	SAC species features	SPA features
	Submerged or partially submerged sea caves		
North Pembrokeshire Woodlands SAC	Old sessile oak woods with Ilex and Blechnum in the British Isles Alluvial forests with Alnus glutinosa and Fraxinus excelsior*	Barbastelle	
North West Pembrokeshire Commons SAC	European dry heaths Transition mires and quaking bogs Northern Atlantic wet heaths with Erica tetralix Molinia meadows on calcareous, peaty or clay laden soils	Floating water plantain	
Pembrokeshire Bat Sites and Bosherton Lakes SAC	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.	Greater horseshoe bat Lesser horseshoe bat Otter	
Pembrokeshire Marine SAC	Estuaries Large shallow inlets and bays Reefs Sandbanks which are slightly covered by seawater at all times Mudflats and sandflats not covered by seawater at low tide Coastal lagoons Atlantic salt meadows Submerged or partially submerged sea caves	Grey seal Shore dock Sea lamprey River lamprey Allis shad Twaite shad Otter	
Preseli SAC	Northern Atlantic wet heaths with Erica tetralix European dry heaths Depressions on peat substrates of the Rhynchosporion Alkaline fens	Marsh fritillary butterfly Southern damselfly Slender green feather-moss	
Ramsey and St David's Peninsula Coast SPA			Pyrrhocorax pyrrhocorax (Chough)
Skomer, Skokholm and the Seas off Pembrokeshire Coast SPA			Asio flammeus (Short-eared owl) Fratricula arctica (Puffin) Hydrobates Pelagicus (Storm petrel) Larus Fuscus (Lesser black-backed gull) Puffinus puffinus (Manx Shearwater)

European Sites *	SAC habitat features	SAC species features	SPA features
			Pyrrhocorax pyrrhocorax (Chough)
St David's SAC	Vegetated sea cliffs of the Atlantic and Baltic coasts European dry heaths	Floating water-plantain	
West Wales Marine SAC		Harbour porpoise	
Outside Plan Area			
Carmarthen Bay Dunes SAC	Embryonic shifting dunes Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") Fixed coastal dunes with herbaceous vegetation ("grey dunes") Dunes with <i>salix repens</i> spp. <i>argentea</i> Humid dune slacks	Narrow mouthed whorl snail Petalwork Fen orchid	
River Teifi SAC	Watercourses of plain to montane levels with <i>Ranunculus</i> and <i>Callitriche</i> vegetation Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i>	Brook lamprey River lamprey Atlantic samlon Bullhead Otter Floating water plantain Sea lamprey	
Yerbeston Tops SAC	<i>Molinia</i> meadows on calcareous, peaty or clay laden soils	Marsh fritillary butterfly	

*The conservation objectives for all the sites listed can be found within the relevant Site Management Plans which are available on the NRW website²⁰.

²⁰ <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/find-protected-areas-of-land-and-sea/?lang=en>

Addendum to the Shadow Habitats Regulations

Assessment to the Pembrokeshire Coast National Park

Management Plan 2020-2024

1. This section sets out how amendments arising from public consultation on the Management Plan, Sustainability Appraisal and Equality Impact Assessment have been considered in terms of the Habitats Regulations Assessment of the Pembrokeshire Coast National Park Management Plan 2020-2024.

- 4.2. The Shadow Habitats Regulations Assessment, prepared by DTA Ecology Ltd, screened a draft of the Consultation draft National Park Management Plan 2020-2024 under the Habitats Regulations. The recommendations were incorporated into the final Consultation draft National Park Management Plan 2020-2024, enabling the conclusion to be drawn that the Management Plan would have no adverse effect on the integrity of any European sites.

- 2.3. The amendments proposed as a result of public consultation have also been screened for likely effect in the final Report of Engagement and Consultation (Annexes 11,12,13, and 14). None of the proposed amendments are considered to result in any likely significant effects on European protected sites and no further assessment is considered necessary.

Pembrokeshire Coast National Park

National Park Management Plan 2020-2024

Sustainability Appraisal Report – Post Adoption Statement

Pembrokeshire Coast National Park Authority

11th December 2019

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DRAFT

1.0 How environmental/sustainability considerations have been integrated into the Pembrokeshire Coast National Park – National Park Management Plan 2020 - 2024

- 1.1 Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the National Park Management Plan was undertaken for all stages of the development of the plan.
- 1.2 Assessment of the National Park Management Plan was undertaken iteratively, with assessments of the Plan's social, environmental and economic impacts being carried out at the earliest opportunity. During the preparation of the draft National Park Management Plan policies, each policy was drafted assessed and re-assessed over multiple iterations each informed by the Sustainability Appraisal before the policies were finalised. The Sustainability Appraisal report provides an audit trail of this process; the outcomes of this process are also included in information boxes underneath each of the policies in the plan itself.
- 1.3 The social, environmental and economic effects of the National Park Management Plan were assessed through the use of a framework of Sustainability Appraisal Objectives. The framework consists of 15 objectives that were used to judge if the plan would meet those objectives and what the likely effects on those objectives would be.
- 1.4 The Sustainability Appraisal Objectives for the National Park Management Plan were derived by the Authority for previous iterations of the Management Plan and updated for the Local Development Plan Review. There is necessarily a need to ensure a compatibility of approach between the two documents. These Objectives were originally presented in the Sustainability Appraisal Scoping Report of the Local Development Plan in June 2016, and then again for the National Park Management Plan January 2019. The Sustainability Appraisal Objectives are provided in Table 1 below. An additional column has been included to clearly show how the schedule 2 Strategic Environmental Assessment regulations topic areas are covered by the framework.
- 1.5 A shadow Habitats Regulations Assessment of the Consultation draft Management Plan was commissioned and its recommendations were taken into account in drafting the consultation draft Management Plan.

Table 1. Sustainability Framework for Pembrokeshire Coast National Park Management Plan

Sustainability Appraisal Objective:	Strategic Environmental Assessment Directive issue
Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	Biodiversity, Fauna, Flora, Soil, Water, Cultural heritage, Landscape.
Minimise the demand for travel, especially by private car, reduce the impacts of road transport, and enhance opportunities and encourage use of alternatives.	Population, Human health, Air, Climatic factors.
Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	Material assets, Cultural heritage, Landscape.
Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	Human health
Increase the number of visitors using the National Park outside the peak visitor season.	
Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	Biodiversity, Population, Human health, Fauna, Flora, Climatic factors, Material assets.
Reduce factors contributing to climate change.	Air, Climatic factors.
Maximise the contribution of opportunities for	Population,

development to sustaining local communities.	Cultural heritage.
Encourage and facilitate access for all to the National Park, reflecting the social mix of society.	Human health.
Maintain the cultural distinctiveness of communities.	Population, Cultural heritage.
The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	Biodiversity, Fauna, Flora, Landscape.
Reduce the negative impacts of waste.	Human health, Water, Landscape.
Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.	Population, Human health, Material assets.
Maintain and enhance biodiversity both within and outside designated sites.	Biodiversity, Fauna, Flora, Landscape.
Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	Population, Human health, Water, Material assets, Landscape.

2.0 How opinions of consultation bodies and the public have been taken into account

- 2.1 Sustainability Appraisal reports have been issued at each stage of the National Park Management Plan development. These were published for consultation with the public and for consultation with the statutory consultation bodies referred to in the Strategic Environmental Assessment regulations. In Wales these are Natural Resources Wales and Cadw.
- 2.2 All of the responses received during these consultation periods are summarised below.

Sustainability Appraisal Scoping Report (January 2019 – April 2019)

- 2.3 The Sustainability Appraisal Scoping Report was published for consultation with the public and the statutory consultation bodies between January and April of 2019.
- 2.4 Comments were sought on the appropriateness of the Sustainability Appraisal Objectives, the coverage of the issues, and the completeness of the review of relevant plans, policies and programmes and baseline information.
- 2.5 No substantive comments were received from the statutory consultees, and no other comments were received from the public or other organisations. However, some comments were made by the National Park Authority over the wording of one of the Sustainability Appraisal Objectives, to which an amendment was made.

Draft National Park Management Plan (August – October 2019)

- 2.6 The Sustainability Appraisal Report underwent public consultation alongside the draft National Park Management Plan from the beginning of August 2019 until the end of October 2019. Comments were sought on the suitability of the Sustainability Appraisal Framework, the assessment methodology and the assessments made of the emerging National Park Management Plan policies.
- 2.7 No comments were received in relation to the Sustainability Appraisal, and no comments on any of the documents were deemed to have any implications for the Sustainability Appraisal.

Final National Park Management Plan (December 2019)

2.8 The final National Park Management Plan 2020-2024 and accompanying assessments was considered by the National Park Authority on 11th December 2019. [Note: any amendments made at that meeting will be summarised here.]

3.0 Why the adopted National Park Management Plan was chosen

- 3.1 Guidance on Sustainability Appraisal and the Strategic Environmental Assessment Directive require that the likely evolution of the Plan area in the absence of the Management Plan is considered. Many of the Sustainability Objectives for the National Park are subject in large part to policy and activity beyond the remit of the Management Plan. National Park Management Plans Guidance (2007) advises at para 1.27 (page 4) that the Management Plan “is a plan for the geographic area of the Park and not for any one authority. As a strategic over-arching document it co-ordinates and integrates other plans, strategies and actions in the National Park, where these affect the park purposes and duty.”
- 3.2 It is not enough to co-ordinate existing action, but also to determine whether that action is sufficient to affect (improve) the state of the Park in a timely way. Thus, the process of preparing a Management Plan should also identify where new action, or new scales of action, are required to achieve National Park purposes. This has been the case. In the absence of the Management Plan, these additions would have had to have been incorporated – if possible – within other plans. However, it is not clear whether the actions would have been identified in the absence of the Management Plan process. Furthermore, iterative Sustainability Appraisal of the Management Plan has identified additions to a number of policy impacts. In the absence of the Management Plan (and the process which gives rise to it), there is no way of determining the sufficiency of action in relation to Park purposes (also see Section 4 paragraphs 4.10 and 4.11 of the Sustainability Appraisal report).
- 3.3 The process of Plan review, as agreed by the Authority, is set out in a final report of engagement and consultation (National Park Authority 11th December 2019).

Impacts of policy on the Welsh language

Extracts from the Sustainability Appraisal of the consultation draft Pembrokeshire Coast National Park Management Plan 2020-2024

1. The Welsh language is an important part of the cultural distinctiveness of many communities in the National Park. However, they are affected by outward migration of young people and inward migration from other parts of the UK. The percentage of Welsh speakers in the National Park increased between 1991 and 2001. However, while some communities saw small increases in the number of Welsh speakers between 2001 and 2011, many have seen decreases (see table below for headline figures).

	Welsh speakers 2001 Census (%)	Welsh speakers 2011 Census (%)	Change (%)
Pembrokeshire Coast National Park	23.3	21.5	-1.8%
Pembrokeshire	21.5	18.4	-3.1%

Source: Office for National Statistics

2. One of Wales' well-being goals of the Well-being of Future Generations Act 2015 is a Wales of vibrant culture and Welsh language. The Welsh Language (Wales) Measure 2011 introduced a legislative framework which included the creation of a Welsh Language Commissioner and Welsh Language Standards. In making Welsh an official language, the measure brings a duty on relevant authorities to promote and proactively support the Welsh language, and consider the impacts of policy on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.
3. The Sustainability Appraisal of the consultation draft National Park Management Plan 2020-2024 assesses the impacts of proposed policies on the Welsh language.
4. Welsh Government policy regards designated landscapes as having an important role to play to increase public awareness of the value of the Welsh language, both as part of our national heritage and as an important skill in modern life. *Cymraeg 2050* is the ambition of the Welsh Government to see the number of people able to enjoy speaking and using Welsh reach a million by 2050.
5. The principal policy in the draft Management Plan, aimed at promoting Welsh language and dialects, is Policy H2: *Promote the Welsh language and local dialects and celebrate culture and creativity related to the landscape*. Impacts listed under H2 include the following of relevance:
 - a. *Interpret and animate landscape, cultural heritage, natural history and the arts at owned and managed sites.*

- b. *Contribute to the Cymraeg 2050 target for the number of people able to enjoy speaking and using Welsh to reach a million by 2050.*
 - c. *Collaborate with local communities and others to celebrate and record dialect, customs, songs, crafts and other attributes of local identity in the Park and provide opportunities for people to share stories about their relationship with the landscape and their own heritage.*
6. The draft Sustainability Appraisal finds a strong positive association between H2 and Sustainability Appraisal **objective 10: *Maintain the cultural distinctiveness of communities***. It concludes that the policy “contributes very positively to the sustainability appraisal objective on cultural diversity particularly the Welsh language aspect”. Policy L1 also has a strong positive association with Sustainability Appraisal objective 10, and no policies have a negative association with Sustainability Appraisal objective 10.
7. The following table is drawn from the detailed policy assessment tables in the Sustainability Appraisal to summarise the association and consistency of all other policies in the draft Management Plan with Sustainability Appraisal objective 10.

Policy	Association	Comment
L1: Conserve and enhance National Park landscapes and seascapes.	++	The landscape of the National Park is a product of the culture of the communities that created it. By maintaining and enhancing that landscape its distinctiveness is also maintained. Additionally, the policy supports affordable housing (via Local Development Plan 2 policy approach) which can enable young people to afford to live in the communities in which they grew up.
L2: Protect and enhance dark night skies.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
L3: Protect and enhance natural soundscapes.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
W1: Provide and promote sustainable outdoor recreation opportunities for all.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
W2: Provide and promote inspiring outdoor learning and personal development opportunities for all.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
E1: Improve habitat quality, extent and connectivity at scale.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
H1: Conserve and enhance landscapes of particular historic interest, scheduled monuments, listed buildings and their settings.	+	The policy aims to conserve local distinctiveness in the built environment.
H2: Promote the Welsh language and local dialects and celebrate culture and creativity related to the landscape.	++	The policy directly addresses some of the aspects of objective 10, Welsh language and cultural distinctiveness in particular.
N1: Contribute to a low carbon economy for Wales and adapt to climate change.	+	The policy promotes community resilience via the Local Development Plan 2 policy framework.
N2: Conserve and enhance water quality and restore water levels and natural flow regimes.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
N3: Conserve and enhance soils and natural carbon storage.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.
N4: Protect air quality.	0	This policy is unlikely to prove relevant to Sustainability Appraisal objective 10.

Key:

++	There is a generally consistent strong positive association between the policy option and the Sustainability Objectives.
+	There is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objectives.
0	There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).
-	There is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
--	There is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
?	The association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion.